





INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

GENERAL INFORMATION		
Company details	Bluestone Mines Tasmania Joint Venture Pty Ltd Murchison Highway, Zeehan, Tasmania 7469 	 <p>Visual Progress Guide</p>
Date of this report	Publication 15 April 2025	
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About our company	<p>Bluestone Mines Tasmania Joint Venture Pty Ltd (hereinafter referred to as 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), which is part of the scope of this report, 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 fourth 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, various improvements have been made by the company, notably including:</p> <ol style="list-style-type: none"> Achieving third-party verification for water quality (2.2), tailings management (2.8), closure and reclamation (2.14) and incident investigations (3.3) through commissioned studies undertaken by independent consulting firms. Conforming with legal compliance (1.3), training on governance issues (1.7), environmental management system (2.1), water consumption and availability (2.3), air quality (2.5), hazardous and non-hazardous waste management (2.9 and 2.10), banned substances (2.11), biodiversity protection (2.12), training on environmental aspects (2.15), health and safety management 	



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

	<p>system (3.1), safe working practices (3.2), incident follow up (3.4), health and safety training (3.5) labour management system (4.1), discrimination (4.2a), remuneration (4.3), forced labour (4.4), worst and other forms of child labour (4.5, 4.6), training on labour issues (4.9), stakeholder management (5.1), stakeholder mapping and engagement (5.2), local economic development (6.8), and communicating appropriate information on impacts and use of tin (9.3) through developing and implementing related procedures and measures.</p> <p>3. Progressing with transparency (1.5), training on stakeholder issues (5.4) and consultation (6.3) through developing related procedures.</p> <p>The company could regain higher ratings by providing evidence of procedures and implementation evidence on greenhouse gases (2.6), community health and safety (6.2) and policy review (10.1).</p> <p>Note: <i>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.</i></p>
Further information and references	<ol style="list-style-type: none"> 1. Bluestone website 2. Sustainable practices 3. Modern Slavery Policy 4. Metals X 2023 Annual Report 5. Metals X 2023 ESG Annual Report 6. Metals X 2023 Quarterly Reports



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

Contents

PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices	4
PRINCIPLE 2: Seek continual improvement of environmental performance	6
PRINCIPLE 3: Seek continual improvement of health and safety performance	9
PRINCIPLE 4: Seek continual improvement in labour practices.....	10
PRINCIPLE 5: Engage with stakeholders using a participatory approach	12
PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples.....	13
PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict.....	15
PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services	16
PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products	18
PRINCIPLE 10: Work towards reporting against the International Tin Code	19
Appendix A – Description of Tin Code reporting	20



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of two standards of this Principle. It has achieved a high rating of *conforming* in the expectations related to legal compliance and training through maintaining up to date legal compliance records and delivering a training programme on relevant aspects of this Principle. The company is progressing with the expectations related to policies, management systems, business integrity, transparency and whistleblowing procedures.

STANDARD		RATING	ADDITIONAL INFORMATION
1.1	Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through publishing some policies to support legal compliance and improve practices with respect to many of the expectations of the Tin Code.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company has demonstrated that it is progressing with this expectation through developing and implementing a formal system to manage legal compliance and governance issues (Standard 1.3), but it has not provided evidence that business integrity (Standard 1.4) and whistleblowing (Standard 1.6) are fully addressed.
1.3	Legal compliance Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Conforming	The company has demonstrated that it conforms with this expectation as it keeps 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 through the maintenance of legal registers with respect to health and safety and environmental requirements.
1.4	Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.	Progressing	The company has demonstrated that it is progressing with this expectation through establishing senior management roles with responsibility for managing the risk of bribery, corruption, facilitation payments and anti-competitive behaviour, but it has not provided evidence of the procedures that are implemented to manage such risks.
1.5	Transparency Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting ⁽¹⁾ ⁽¹⁾ Reporting is required in an implementing country of EITI.	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence of its support for the implementation of the principles of the Extractive Industries Transparency Initiative (EITI), but it has not provided evidence of a voluntary report confirming that all relevant taxes, fees and/or royalties have been paid to the government by the company. As a mining company that is not located in an EITI implementing country, nor is an EITI Supporting Company, the company is out of the scope of formal EITI reporting.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

1.6	Whistleblowing Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing a functional whistleblowing procedure that is accessible to internal stakeholders, but it has not provided evidence that external stakeholders have access to this procedure.
1.7	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Conforming	The company has demonstrated that it conforms with this expectation by delivering training to employees and contractors on issues relevant to the scope of Principle 1, including legal compliance and the company's Code of Conduct.

INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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 ten standards of this Principle. It has achieved the highest rating of *third-party verified* in three standards through developing and implementing procedures to monitor and manage wastewater generation and discharges, independent reviews of its tailings storage facilities in compliance with legal requirements, and a mine closure plan that has been approved by the government regulator. The company conforms with the expectations related to an environmental management system, water consumption, air quality, waste management, banned substances, biodiversity protection and training on relevant aspects of this Principle. It is progressing with the expectations related to land and soil quality, greenhouse gases, energy consumption, and protected areas.

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.	Conforming	The company has demonstrated that it conforms with this expectation by implementing procedures and plans to manage environmental risks and potential impacts, applying the mitigation hierarchy.
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.	Third-party verified	The company has provided evidence that it developed and implemented procedures to monitor and manage wastewater generation and discharges, enabling it to control the risk of adverse impacts on water quality. This has been third-party verified in its Environmental Monitoring Compliance Audit Report, prepared by an independent consulting firm ECTM.
2.3	Water consumption and availability Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Conforming	The company has demonstrated that it conforms with this expectation through reducing its water consumption in 2023 (per tonne of tin-in-concentrate, relative to 2022), and it is also in the process of refining the site water balance to further improve the management of water use.
2.4	Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Progressing	The company has demonstrated that it is progressing with this expectation through understanding and quantifying its emissions to land and managing releases likely to adversely impact land and soil quality, but it has not provided evidence that it monitors land and soil quality directly. There is no evidence of legal breaches related to environmental management.
2.5	Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to monitor and manage discharges to air, enabling it to control the risk of adverse impacts on air quality.
2.6	Greenhouse gases Companies will seek to measure, monitor and publicly disclose direct and indirect CO2 equivalent (GHG) emissions, and work towards economic reduction targets appropriate to the nature and scale of operations and relevant protocols.	Progressing	The company has demonstrated that it is progressing with this expectation through publicly disclosing its GHG emissions, but it has not provided evidence that it is



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

			working towards economic targets to reduce GHG emissions.
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 that it is progressing with this expectation through disclosing energy consumption information and recording a decrease in energy consumption in 2023 (per tonne of tin-in-concentrate, relative to 2022), but it has not described energy consumption reduction targets or methods or the implementation of increased energy from renewable sources.
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>	Third-party verified	The company has provided evidence that it commissioned regular third-party independent reviews and surveillance of its tailings storage facilities in compliance with legal requirements and the international ANCOLD standard. This has been third-party verified in its TSFs Monitoring Review Report and other related reports by GHD.
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>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to monitor and report on the generation of hazardous waste and manage the risk of adverse impacts on human health and the environment, including through the recycling of such waste.
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>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to monitor and report on the generation of non-hazardous and inert waste and manage the risk of adverse impacts on human health and the environment, including through the recycling of such wastes.
2.11	<p>Banned substances Companies will not use substances that are banned under international convention or local laws.</p>	Conforming	The company has demonstrated that it conforms with this expectation as it has a system in place through its register of chemicals it uses and procedures for screening new chemicals to ensure it does not use substances that are banned under international convention or local laws.
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 by providing evidence that biodiversity management and protection are implemented and that potential biodiversity impacts arising from new activities at its site are considered through appropriate studies.
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 that it is progressing with this expectation through providing evidence that it respects legally protected areas in accordance with local laws, but it has not provided evidence on how it manages potential impacts of its operations 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>	Third-party verified	The company has provided evidence that it developed a Mine Closure Plan that has been approved by the government regulator and that allocates adequate financial resources to enable the implementation of closure and rehabilitation of operations in accordance



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

			with local requirements and expectations of key stakeholders. This has been third-party verified by the government regulator.
2.15	<p>Training</p> <p>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>	Conforming	The company has demonstrated that it conforms with this expectation by delivering training to employees and contractors on environment-related topics relevant to this Principle.

INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating in all the standards of this Principle. It has achieved the highest rating of *third-party verified* in one standard related to incident investigations through implementing procedures to document reportable health and safety incidents. The company conforms with the expectations related to health and safety management systems, safe working practices, incident follow up, and training through implementing an occupational health and safety management system, maintaining safe and healthy working conditions, providing evidence of incident follow ups, and providing training for employees and contractors on relevant aspects of Principle 3.

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.	Conforming	The company has demonstrated that it conforms with this expectation through implementing an occupational health and safety management system that implements and monitors safe working practices, and implements procedures for incident investigation and follow-up (corrective actions).
3.2	Safe working practices Companies will maintain safe and healthy working conditions by implementing measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.	Conforming	The company has demonstrated that it conforms with this expectation through maintaining 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.
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.	Third-party verified	The company has provided evidence that it developed and implemented procedures to document reportable health and safety incidents in a transparent and inclusive way that allows affected workers to provide input. This has been third-party verified by an independent consulting firm.
3.4	Incident follow up Following a reportable health and safety incident, companies will define and implement corrective actions in a timely fashion and monitor the effectiveness of such actions.	Conforming	The company has demonstrated that it conforms with this expectation through defining and implementing corrective actions in a timely fashion following a reportable health and safety incident, and monitoring the effectiveness of such actions.
3.5	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 3, require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.	Conforming	The company has demonstrated that it conforms with this expectation by delivering training to employees and contractors on relevant aspects of this Principle.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of seven standards of this Principle. It has achieved a high rating of *conforming* across most of Principle 4's expectations through systematically managing labour issues, implementing an equality policy, providing evidence of wages that exceed the legal minimum and a public Statement on Modern Slavery (which also addresses child labour), engaging with workers on freedom of association and collective bargaining and providing training on relevant aspects of this Principle. The company is progressing with the expectations related to violence and harassment and working hours.

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.	Conforming	The company has demonstrated that it conforms with this expectation as it systematically manages labour issues under Principle 4 through its Enterprise Agreement and Code of Conduct.
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.	Conforming	The company has demonstrated that it conforms with this expectation through implementing an Equality Policy (including on gender) and does 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.
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 that it is progressing with this expectation through its grievance procedure for employees and contractors, Policy on Bullying and Code of Conduct, but it has not provided evidence of procedures it implements to manage the risk of workplace violence and harassment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through its evidence of wages that exceed the legal minimum, and overtime and statutory payments are made in compliance with strict Australian laws.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	The company has demonstrated that it conforms with this expectation as based on legal compliance with strict Australian laws, and policies and procedures noted in the company's Statement on Modern Slavery, there is no indication that the company uses or supports slavery, servitude, forced or compulsory 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.	Conforming	The company has demonstrated that it conforms with this expectation as based on legal compliance with strict Australian laws and policies and procedures noted in the company's Statement on Modern Slavery (which is defined



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

			as including child labour), there is no indication that the company engages in any form of child labour (including the worst forms as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children).
4.6	<p>Child labour – other forms</p> <p>Companies may employ children of minimum age 14 years, or older as defined by local laws, to undertake non-hazardous, light work that does constrain their ability to gain an education.</p>	Conforming	The company has demonstrated that it conforms with this expectation as based on legal compliance with strict Australian laws and policies and procedures noted in the company's Statement on Modern Slavery (which is defined as including child labour), there is no indication that the company engages in any form of child labour.
4.7	<p>Working hours</p> <p>Companies will comply with local laws on working hours and provide paid annual and statutory leave, and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period⁽⁴⁾ or as prescribed by local laws (whichever is higher).</p> <p>⁽⁴⁾ In circumstances such as shift work the averaging of working hours over a different period is permitted as recognised by the ILO and/or local laws.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence that normal and overtime hours are within legal limits and the provision of statutory benefits, but it has not provided evidence confirming the voluntary basis of overtime.
4.8	<p>Freedom of association and collective bargaining</p> <p>Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.</p>	Conforming	The company has demonstrated that it conforms with this expectation through engaging with workers on freedom of association and collective bargaining and providing evidence of an Enterprise Agreement between the company and unions.
4.9	<p>Training</p> <p>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>	Conforming	The company has demonstrated that it conforms with this expectation by delivering training to employees and contractors on relevant aspects of this Principle.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of three standards of this Principle. It has achieved a high rating of *conforming* in the expectations related to stakeholder management, mapping and engagement through evidence of a Consultation Manager tool. The company is progressing with the expectations related to grievance mechanism and training on relevant 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.	Conforming	The company has demonstrated that it conforms with this expectation through implementing a systematic approach to stakeholder management to control and monitor relevant aspects of Tin Code Principle 5. It uses a Consultation Manager tool and has specific procedures for the management of contractors.
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.	Conforming	The company has demonstrated that it conforms with this expectation as it undertakes stakeholder mapping and engagement, based on the company's use of the Consultation Manager tool.
5.3	Grievance mechanism Companies will establish an appropriate grievance mechanism to receive, and facilitate resolution of, concerns raised by individuals, workers, communities or civil society organisations regarding company activities.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing internal grievance processes for affected people in the workplace, but it has not provided evidence of a 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.	Progressing	The company has demonstrated that it is progressing with this expectation through undertaking general training relevant to relationships with some stakeholders, but it has not provided evidence for training of relevant staff on stakeholder mapping, engagement and management.

INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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 two standards of this Principle. It has achieved a high rating of *conforming* in the expectations related to local development and cultural heritage protection through developing and implementing local development and sponsorship initiatives, and by integrating cultural heritage protection into its Environmental Management Plan. It is progressing with the expectations related to community health and safety, consultation, free, prior and informed consent (FPIC), land rights, use and access, physical and economic displacement and natural resources use and availability. The company could improve its ratings by providing evidence related to community management and training on relevant aspects of this Principle.

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 procedures for the management of community-related issues.
6.2 Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing environmental management measures with the goal of eliminating some negative health and safety impacts of local communities, and considering communities in emergency planning related to tailings, but it has not provided evidence of a specific plan or procedures to manage and monitor 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.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing a stakeholder engagement tool, but it has not provided evidence of consultations with local communities.
6.4 Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.	Progressing	The company has demonstrated that it is progressing with this expectation through strict laws enacted in Australia with respect to free, prior and informed consent (FPIC) but it has not provided evidence of procedures implemented 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 that it is progressing with this expectation through strict laws enacted in Australia with respect to land rights, use and access, but it has not provided evidence of procedures implemented 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 that it is progressing with this expectation through strict laws enacted in Australia with respect to resettlement, but it has not provided evidence of procedures implemented to ensure compliance with such laws.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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 that it is progressing with this expectation through strict laws enacted in Australia with respect to economic displacement, but it has not provided evidence of procedures implemented 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>	Conforming	The company has demonstrated that it conforms with this expectation as it has developed and implemented local development and sponsorship initiatives.
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 that it is progressing with this expectation through strict laws enacted in Australia with respect to natural resource use and availability, but it has not provided evidence of procedures implemented 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 integrating cultural heritage protection into its Environmental Management Plan and complying with strict Australian laws.
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 relevant aspects of this Principle.

INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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 is progressing with the expectations related to implementing a systematic approach to human rights management, guidance on the Voluntary Principles on Security and Human Rights, and training on some relevant aspects of this Principle. 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 that it is progressing with this expectation as there is no indication the company is causing adverse impacts on human rights, but it has not provided evidence of a specific procedure for identifying and managing risks.
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 that it is progressing with this expectation through complying with local laws when using direct or contracted workers, but it has not provided evidence that security is guided by the Voluntary Principles on Security and Human Rights.
7.3	<p>Responsible sourcing Companies^(6,7) will evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement⁽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 that it is progressing with this expectation through providing evidence of training on some but not all the relevant aspects covered by this Principle.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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

Overview of Principle Performance

Through requesting some major suppliers of goods and services to meet or work towards principles that are equivalent to the 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	Not relevant	This expectation is not relevant as the company does not source minerals from external parties.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

	Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code.		
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 that it is progressing with this expectation through requesting some major suppliers to meet or work towards principles that are equivalent to the expectations of the Tin Code.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of one standard of this Principle. Through its membership of International Tin Association, the company conforms with the expectation to support the understanding of the potential effects of tin on humans and the environment and encourages the safe, appropriate, and efficient use of tin. The company communicates information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, with no noted breaches under data protection laws.

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	The company has demonstrated that it conforms with this expectation as through its membership of International Tin Association, it advances the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.
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	The company has demonstrated that it conforms with this expectation as through its membership of International Tin Association, it supports 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.
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	The company has demonstrated that it conforms with this expectation through disclosing information relating to its own site and operations and providing evidence of its contribution to the disclosure of more general information related to tin and the tin industry, with no noted breaches under data protection laws.



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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 Tin Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Tin Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this report on the Tin Code, conforming with most of the reporting expectations. The company is progressing in the expectation related to policy review through the periodic review of some but not all of its policies.

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	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence that some but not all policies relevant to the Tin Code are reviewed at least annually.
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



INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

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.