
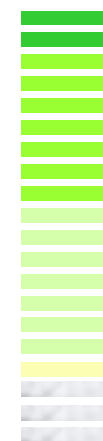


INTERNATIONAL TIN CODE OF CONDUCT REPORT: Thailand Smelting & Refining



GENERAL INFORMATION	
Company details	Thailand Smelting and Refining Co Ltd.  80 Moo 8 Sakdidej Road, Tambon Vichit, Amphur Muang, Phuket 83000 Thailand.
Date of this report	October 2020
Date of previous report	June 2019
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd
Report verified by	Warit Choovaree
Contact information	coc@internationaltin.org
About our company	<p>Thailand Smelting and Refining Co Ltd, more commonly known as THAISARCO, was established in 1963 for the smelting and refining of domestically mined tin ores from Thailand. More recently the company obtains minerals, metal and minimal amounts of secondary materials from a variety of sources for smelting and/or refining into pure tin, tin solder and alloys and other tin-related products. Mineral concentrates are obtained from domestic, Australian, central African and other sources, while non-secondary metal is obtained from producers in Asia, including China and Indonesia. The company is managed and operated by its majority shareholder Amalgamated Metal Corporation PLC of the UK with a minority shareholding being held by Escoy Holdings of Malaysia. It is registered on the London Metal Exchange (LME) under the THAISARCO and PHUKET brands.</p> <p>THAISARCO holds ISO 9001 and ISO 14001 standards for the smelter and ISO/IEC 17025 for the laboratory.</p>
Significant changes from previous report	<p>This second Code report demonstrates the steps taken to improve procedures and processes by Thailand Smelting and Refining Co Ltd and collaboration with the ITA to ensure continuous improvement in meeting the requirements of the Code. Since the last report, various improvements have also been made by the company, notably including:</p> <ol style="list-style-type: none"> 1. Development and publication of policies to support legal compliance (1.1, 1.4). 2. Adoption of new and innovative approaches to training (5.4, 6.11) including areas such as stakeholder management. 3. Implementing a formal mechanism to address concerns raised by external stakeholders including individuals, communities or civil society organisations (5.3). 4. Developing a systematic approach to human rights management (7.1, 7.2).



Visual Progress Guide

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	<ol style="list-style-type: none"> 5. Commitment to collaborating and working with ITA to implement measures to positively influence practices of ASM (8.1 to 8.6) 6. Some progress in communicating standards of the Code to large scale mineral suppliers (8.8), and suppliers of goods and services (8.10)
Further information and references	<ol style="list-style-type: none"> 1. ISO 9001 and ISO 14001 audit records 2. Labour Protection Act, B.E. 2541 - 1998 3. Staff Handbook and personnel Manual 2018 4. Code of Conduct for suppliers of goods and services 2018 5. Amalgamated Metal Corporation PLC – Annual Report & Accounts 2018

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

Overview of Principle Performance

The company conforms to the standards for the development of policies relevant for all principles of the Code, keeping up to date business registrations, licences and other documents and to enable whistleblowing for reporting of concerns. It is also making progress in developing a management system to control and monitor compliance and governance, as well as establish procedures to prevent bribery and corruption. It is not required to report tax and royalty payments under the Extractive Industries Transparency Initiative (EITI) as Thailand is not an implementing country of the EITI. It is progressing by carrying out some training of staff and contractors and could extend this system to all aspects of these standards

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 of Conduct.	Conforming	
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company has developed and implemented elements of a formal system to manage legal compliance and governance issues; to improve its rating the company could develop and implement a comprehensive formal system.
1.3	Legal compliance Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Conforming	
1.4	Business integrity Companies will seek to prevent bribery and corruption.	Progressing	The company is making progress with establishing procedures to prevent bribery and corruption. To improve its rating, the company could demonstrate it has developed and implemented formal procedures to record and avoid bribery and corruption.
1.5	Transparency Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government	Not Relevant	Conformance with the requirement is considered not relevant as Thailand is not an implementing country of the EITI at present.
1.6	Whistleblowing Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Code of Conduct.	Conforming	
1.7	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company provides employees and contractors with induction training covering some aspects of legal compliance and governance, in particular related to occupational health and safety and environmental protection; to improve its rating the company could demonstrate that induction and refresher training of

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			employees extends to all aspects of legal compliance and good practice aspects (as defined in the Tin Code of Conduct, Principle 1) and that such training is also required for contractors.
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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has developed and implemented a third-party verified ISO 14001 environmental management system and has a verified approach to training staff and contractors on environmental issues, managing discharges to water, land, soil and air. It also conforms with expectations for management of hazardous and non-hazardous waste and establishing procedures to avoid the use of any banned respect legally protected areas. The company evaluates water consumption and identifies protected area and biodiversity protection needs as part of ISO 14001 and is progressing to reduce potential impacts of each. It is also making progress in monitoring energy consumption. Conformance with expectations on greenhouse gases, tailings management, closure and reclamation do not apply to the company's operations.

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.	Third-Party Verified	
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	
2.3	Water consumption and availability Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Progressing	The company has identified water consumption and availability issues and Rated related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to reduce water consumption and minimise negative impacts on water availability.
2.4	Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Third-Party Verified	
2.5	Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Third-Party Verified	
2.6	Greenhouse gases Companies emitting more than 25,000 tonnes of CO2-equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.	Not Relevant	Conformance with the requirement is considered not relevant as the company's emissions are below the threshold for reporting of 25,000 tonnes per annum.
2.7	Energy consumption Companies will seek to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy per unit of production or increasing the share from renewable sources.	Progressing	The company monitors energy consumption, but to improve its rating it could calculate direct and indirect consumption of energy per unit of production relative to an appropriate baseline year in order to show trends over time.

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2.8	Tailings management Companies will store or dispose of tailings in a manner that minimises the risk of impacts to the environment and human health.	Not Relevant	Tailings from mineral processing activities are not relevant to smelting and refining facilities and therefore this requirement does not apply.
2.9	Hazardous waste management Wherever possible companies will avoid the generation of hazardous wastes; where this is not possible companies will manage and dispose of wastes in a manner that minimises negative impacts on human health and the environment.	Conforming	
2.10	Non-hazardous and inert waste management Wherever possible companies will minimise the production of non-hazardous and inert wastes and consider reuse and recycling options before disposing of them in an appropriate manner.	Conforming	
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Conforming	
2.12	Biodiversity protection Companies will seek to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.	Progressing	The company has identified and Rated environmental impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has taking steps to specifically understand its potential impacts on biodiversity.
2.13	Protected areas Companies will respect legally protected areas in accordance with local laws and will seek to understand and manage potential impacts of operations on adjacent zones.	Conforming	
2.14	Closure and reclamation Companies will allocate adequate financial resources to enable implementation of closure and rehabilitation of operations in accordance with local requirements and expectations of key stakeholders.	Not Relevant	Conformance with the requirement is considered not relevant as closure and rehabilitation plans do not apply to non-mining operations and facilities.
2.15	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 2 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Third-Party Verified	

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company conforms with the expectation for implementing a health and safety management system and has measures in place to maintain and continually improve health and safety conditions for staff and visitors to its sites, including appropriate formal investigation of incidents affecting workers. Incident follow-up and monitoring through corrective action is currently performed informally. It is progressing with incident follow-up and monitoring through corrective action and providing employees with induction and refresher training and requires contractors to do the same. It could provide evidence that this is extended to visitors.

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	
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	
3.3	Incident investigations Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input.	Conforming	
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	
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 provides employees with induction and refresher training and requires contractors to do the same with their workers as relevant to Principle 3 and their specific tasks and work areas; to improve its rating the company could demonstrate it also provides appropriate health and safety briefings to facility visitors.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company conforms with the expectation to implement procedures to manage the risk of discrimination in employment decisions and engage formally with workers on freedom of association and collective bargaining and ensuring workers receive fair remuneration. The company abides by Thai Labour Protection Act B.E 2541 (1998) which allows for employment of young workers (categorised as 15 years but younger than 18. It is progressing with the development of a formal system to manage labour issues and with the provision of training on labour-related issues for contractors. Similarly, while staff receive one day off per week the company is progressing to ensuring overtime is on a voluntary basis. It could provide evidence that has implemented formal procedures to eliminate the risk of forced labour at its operations.

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 manages most aspects related to labour issues, but to improve its rating the company could implement a formal labour management system to further enhance its control and monitoring activities.
4.2	Discrimination Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Conforming	
4.3	Remuneration Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.	Conforming	
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Informal	To improve its rating the company could demonstrate it has implemented formal procedures to eliminate the risk of forced labour at its operations.
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	
4.6	Child labour – other forms Companies may employ children of minimum age 14 years, or older as defined by local laws, to undertake non-hazardous, light work that does constrain their ability to gain an education.	Conforming	
4.7	Working hours Companies will comply with local laws and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period or as prescribed by local laws (whichever is higher).	Progressing	The company Staff Handbook notes workers receive one day off per week; to improve its rating the company could confirm that overtime is voluntary as required under the Labour Protection Act B.E 2541 (1998).
4.8	Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	

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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	<p>To improve its rating the company could demonstrate that induction and refresher training of employees includes coverage of discrimination, child labour and forced labour issues (as defined in the Tin Code of Conduct, Principle 4) and that training on labour-related issues is also required for contractors.</p>
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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has enhanced its provision of appropriate and periodic training for employees although this does not yet extend to all aspects of this principle. The company conforms with the requirement to manage grievances and does so with respect to its employees. It continues progressing with formalising its approach to stakeholder management and establishing a formal approach to stakeholder mapping.

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 manages some aspects related to stakeholder issues, but to improve its rating the company could implement a formal stakeholder management system to further enhance its control and monitoring activities.
5.2	Stakeholder mapping and engagement Companies will seek to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities, and plan a participatory approach to engagement including disadvantaged and vulnerable groups.	Progressing	To improve its rating the company could demonstrate it has completed stakeholder mapping and engaged effectively with all its stakeholders.
5.3	Grievance mechanism Companies will establish an appropriate grievance mechanism to receive, and facilitate resolution of, concerns raised by individuals, workers, communities or civil society organisations regarding company activities.	Conforming	
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	To improve its rating the company could demonstrate that induction and refresher training of employees extends to covering stakeholder engagement and management issues (as defined in the Tin Code of Conduct, Principle 5) and that such training is also required for contractors.

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

Overview of Principle Performance

The company conforms with the requirement of the standard to consult with local communities and indigenous peoples in a way that allows them to express their views. It has in place some measures that contribute to progress in the management of its impact on community health and safety, contributing to economic development of local communities and indigenous peoples and now also formalising aspects of training under this principle. A number of standards are not relevant for the non-mining context.

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.	Progressing	The company has a community relations policy that notes the importance of contributing to local development, to improve its rating the company could demonstrate how implementation is addressed.
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 implemented some measures that contribute to management of impacts on community health and safety (these measures generally relate to management of environmental and OHS issues rather than specifically targeting community health and safety); to improve its rating the company could implement additional management measures to address residual health and safety issues not addressed by existing measures.
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.	Conforming	
6.4	Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.	Not Relevant	The requirement for FPIC is not relevant to the context in which the company operates.
6.5	Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Not Relevant	This requirement is not relevant to the context in which the company operates.
6.6	Physical displacement (resettlement) Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Not Relevant	This requirement is not relevant to the context in which the company operates.
6.7	Economic displacement (livelihoods) Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.	Not Relevant	This requirement is not relevant to the context in which the company operates.

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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 contributes to various charitable and welfare groups. This is done to maintain good social cohesion but to improve its rating the company could provide evidence of analysis of development needs of local communities and records of consultations with local communities in order to address local economic development.
6.9	<p>Natural resource use and availability Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.</p>	Not Relevant	This requirement is not relevant to the context in which the company operates.
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 minimize, mitigate and/or compensate for such impacts.</p>	Not Relevant	This requirement is not relevant to the context in which the company operates.
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>	Progressing	To improve its rating the company should demonstrate that induction and refresher training of employees extends to local community and indigenous peoples issues (as defined in the Tin Code of Conduct, Principle 6) and that such training is also required for contractors.

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

Overview of Principle Performance

The company sources minerals from a number of countries and has some procedures in place to assess the risks associated with those supplies. Minerals from Dodd-Frank countries are partly sourced via the ITSCI programme which conforms with OECD due diligence standards, but evaluation of OECD conformance of other processes for Dodd Frank sources, and assessment of all supplies for conflict or high-risk red-flags is not available. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified. The company is progressing with a systematic approach to human rights management and good practice in use of security personnel. The company does not currently have a systematic approach to training for employees and onsite contractors on avoiding human rights but considers such training in an informal manner.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	Human rights management Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.	Progressing	To improve its rating the company could develop a systematic approach to human rights management to enhance formal control and monitoring.
7.2	Use of private or state security personnel Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law.	Progressing	To improve its rating, the company could demonstrate the company's direct or contracted security workers are guided by the Voluntary Principles on Security and Human Rights.
7.3	Responsible sourcing Companies will evaluate potential risks when sourcing minerals and seek to avoid purchases that may support conflict or human rights abuses according to international expectations and laws.	Progressing	The company sources minerals from a number of countries and has some procedures in place to assess the risks associated with those supplies. Minerals from Dodd-Frank countries are partly sourced via the ITSCI programme which conforms with OECD due diligence standards, but evaluation of OECD conformance of other processes for Dodd Frank sources, and assessment of all supplies for conflict or high-risk red-flags is not available. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified. It is progressing with ITA to explore tools for assessing risks associated with minerals sourced from conflict or high-risk, red-flagged areas.
7.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Informal	To improve its rating the company could demonstrate that induction and refresher training of employees extends to human rights and conflict-related issues (as defined in the Tin Code of Conduct, Principle 7) and that such training is also required for contractors.

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

Overview of Principle Performance

The company now has a Code of Conduct for suppliers of goods and services and is progressing but could further demonstrate their Code has been issued to all relevant major suppliers. Similarly, it has requested some major suppliers of large-scale (LSM) produced minerals to meet or work towards principles of this Code but further implementation actions would be beneficial. The company is now also progressing with developing general guidance that encourages suppliers of all artisanal and small-scale (ASM) minerals to communicate and support the standards of the Code, potentially through practical project opportunities. The standard relating to suppliers of secondary materials is considered not relevant since the company currently has no major suppliers of secondary material, with around 1% of total input from that source.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.	Progressing	The company is progressing with requests to suppliers to improve their understanding of the upstream supply chain, the location and importance of ASM producers, and to encourage communication through suppliers on the objectives of the Code and guidance on ASM practices.
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.	Progressing	The company is progressing with requests to suppliers to communicate the importance of formalisation and engaging in practical projects to encourage formalisation of ASM practices.
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.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on managing environmental impacts in ASM as appropriate to the production area.
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.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on managing health and safety impact in ASM as appropriate to the production area.
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.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding concerns over forced or compulsory labour impact in ASM as appropriate to the production area.
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.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding negotiating with communities and indigenous peoples on

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			the impact of access to land issues in ASM as appropriate to the production area.
8.7	Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding serious human rights abuses and conflict issues in ASM as appropriate to the production area.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Progressing	The company has provided evidence to confirm it has formally requested some major suppliers of LSM produced minerals meet or work towards principles of this Code of Conduct.
8.9	Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Code of Conduct.	Not Relevant	This requirement is considered not relevant since the company currently has no major suppliers of secondary material, with around 1% of total input from that source.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Progressing	The company has a Code of Conduct for Suppliers of Goods and Services. To improve its rating, the company could demonstrate this has been issued to all relevant major suppliers.

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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, and the REACH consortium, the company conforms with the expectation to support the development of improved understanding of the properties and potential effects of tin on humans and the environment. It also supports research and innovation to promote the safe, appropriate and efficient use of tin. The company was able to provide evidence of occasionally communicating accurate public information on tin to the tin industry and its users 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	
9.2	Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	
9.3	Communicating appropriate information Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality.	Conforming	

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

Overview of Principle Performance

The management and staff of THAISARCO 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 standards of the Code through annual policy and management review. They proactively worked with the Independent External Assessor and the International Tin Association to develop this first company report on the Code.

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	
10.2	Communicating reporting information Companies will agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	
10.3	Management Review Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	

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Appendix A – Description of Code reporting

Evidence review process: The assessment of conformance with the Principles and Standards relies on detailed evaluation of documentary evidence and discussion with the company to ensure a full understanding of progress. ITA encourages members to provide maximum available information and collates this into an evidence dossier for submission to the Independent Assessor. During a period of feedback and consultation the company may submit further evidence to clarify or add to the information originally provided in order to improve accuracy. The Independent Assessor then determines the final 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 pilot reporting is a consulting firm with more than 25 years’ experience working on environmental and social issues and impacts in the natural resource sector. It specialises in analysis, prevention and management of environmental and social issues in the oil and gas, mining and aggregates industries worldwide and is familiar with large scale and artisanal mining, and acts as auditor and/or advisor to other commodity standards initiatives such as Bettercoal.

Reporting guide: The ‘visual progress guide’ on the title page is a general representation of the proportion of 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: In the reporting format, details of ‘Additional Information’ is not included for ‘Conforming’ and ‘Third-party Verified’ standards but is provided in the case of other Ratings as a useful guide to show progress.