



# INTERNATIONAL TIN CODE REPORT: Aurubis Beerse NV (formerly Metallo Belgium N.V.)

GENERAL INFORMATION		
Company details	Aurubis Beerse NV (formerly Metallo Belgium N.V.) Nieuwe Dreef 33, 2340 Beerse, Belgium	<p>Visual Progress Guide</p>
Date of this report	April 2021 (Published January 2022)	
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About our company	<p>Aurubis Beerse NV was founded in 1919 as ‘La Metallo-Chimique N.V.’ and is today part of the Aurubis Group. The company recycles and refines complex, low grade metallic and oxidic secondary raw materials into non-ferrous metals, metal products and minerals. Feed materials are sourced across the entire supply chain and globally, from metal merchants, scrap and waste processors to direct from industry itself and in total around 350,000 tonnes of raw materials are recycled annually. The company uses smelting, converting, distillation, and electrolysis techniques, many of which have been designed in-house, to produce metals, such as copper and lead, as well as nickel and zinc oxides among other products. Metallo Belgium is the biggest producer of recycled tin in the world with an annual production of around 10,000 tonnes per year.</p> <p>It is registered on the London Metal Exchange (LME) under the brand <b>MC</b>.</p>	
Significant changes from previous report	<p>This second Tin Code report demonstrates the steps Aurubis Beerse NV has taken to improve procedures and practices and highlights several areas of progress. The report also illustrates the company’s continued collaboration with the Tin Code team to achieve continuous improvement. Since the previous report, improved ratings have been achieved for a number of standards, including:</p> <ol style="list-style-type: none"> <li>1. Implemented complete set of publicly available policies that address all of the Tin Code Principles. (1.1)</li> <li>2. Demonstrated third-party verification implemented whistleblowing and grievance mechanism procedures for internal and external stakeholders. (1.6, 5.3)</li> <li>3. Adoption of new and innovative approaches to training (1.7, 2.15, 6.11) including areas such as legal compliance and governance, environmental management and community-related issues.</li> </ol>	



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	<ol style="list-style-type: none"><li>4. Carried out third-party validation of a risk assessment of known and potential environmental risks and mitigative activity that has been executed (2.3, 2.4, 2.6 ,2.7, 2.9, 2.10, 2.12, 2.13) such as initiatives to reduce CO2 emissions and financial support towards eliminating acid deposition in soil and land.</li><li>5. Demonstrated third-party verification of systematic stakeholder management. (5.1)</li><li>6. New initiatives to support local economic development through its social engagement strategy including details of charitable donations and supporting site visits by local school students. (6.8)</li></ol>
Further information and references	<ol style="list-style-type: none"><li>1. Company website <a href="https://www.aurubis.com/beerse/">https://www.aurubis.com/beerse/</a></li><li>2. Metallo Belgium holds ISO 9001 (quality) and ISO 14001 (environment) standards.</li><li>3. Company Policies <a href="https://www.metallo.com/downloads">https://www.metallo.com/downloads</a></li><li>4. Environmental Risk Assessment Metallo Group - October 14, 2020</li><li>5. Responsible Sourcing - Annual Training (Hofkens I and Germonpré V)</li><li>6. Sponsoring and Social engagement - ELKAR KIROLAK Cycling</li></ol>



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

### Overview of Principle Performance

The company has made a number of improvements and now conforms with requirements to develop and publish policies to support legal compliance as well as all other Tin Code principles. It also now implements a whistleblowing procedure and provides training covering legal compliance for employees and contractors.

The company continues to implement a formal management system to manage legal compliance and governance issues and has procedures to prevent bribery. The company is also making progress in keeping up to date all required registrations, licenses and other document necessary for legal operation; progress is being made to find an improved solution for storage of one substance. It is not required to report under the Extractive Industries Transparency Initiative (EITI) as Belgium is not an implementing country of the EITI.

STANDARD		RATING	ADDITIONAL INFORMATION
1.1	<b>Policies</b> Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code.	Conforming	The company has a complete set of publicly available policies that address all of the Tin Code Principles.
1.2	<b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Conforming	The company conforms with the requirement to develop and implement a formal system to manage legal compliance and governance issues.
1.3	<b>Legal compliance</b> Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Progressing	The company is progressing with the requirement to 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. Progress is being made to find an improved solution for storage of one substance.
1.4	<b>Business integrity</b> Companies will seek to prevent bribery and corruption.	Conforming	The company has developed and implemented procedures to record and avoid bribery and corruption.
1.5	<b>Transparency</b> 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 Belgium is not an implementing country of the EITI at present.
1.6	<b>Whistleblowing</b> Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Tin Code.	Conforming	Company has developed and implemented whistleblowing procedures for internal and external stakeholders.
1.7	<b>Training</b> 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 provides employees and contractors with induction training covering s legal compliance and governance.



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## PRINCIPLE 2: Seek continual improvement of environmental performance

### Overview of Principle Performance

The company has made a number of improvements which has increase their performance rating in eight environmental standards, As a result it has now achieved the ranking of “Conforming” or “Third-party verified” in 100% of the relevant standards for this principle. The company has maintained its third-party verified ISO 14001 environmental management system and has further supplemented its third-party validated risk assessment of its known potential environmental risks and mitigative activity on topics associated with the Tin Code including water quality, water consumption, discharge to land and soil, air quality, greenhouse emissions, energy consumption, hazardous and non-hazardous waste management.

The company has also improved other activities and now conforms with the requirement to understand potential impacts on biodiversity and avoid activities that modify or degrade critical natural habitats through an action plan which respects legally protected areas in accordance with local laws. It also conforms with the requirements to avoid use of banned substances in its operations and to provide employees and contractors with regular training on environmental issues. As it is a recycling company, tailings from mineral processing and closure and reclamation activities are not relevant requirements.

STANDARD		RATING	ADDITIONAL INFORMATION
2.1	<b>Management system</b> 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	The company conforms with the requirement to develop and implement an environmental management system and this has been verified by an independent third-party.
2.2	<b>Water quality</b> 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 conforms with the requirement to seek to understand and manage discharges to surface waters and groundwater in order to minimise negative impacts on water quality; conformance with this requirement has been verified by government monitoring and regulation.
2.3	<b>Water consumption and availability</b> Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Third-Party Verified	The company conforms with the requirement to seek to reduce water consumption in their operations in order to minimise negative impacts on water availability; conformance with this requirement has been verified by a third-party.
2.4	<b>Land and soil quality</b> Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Third-Party Verified	The company conforms with the requirement to seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality; conformance with this requirement has been verified by a third-party.
2.5	<b>Air quality</b> Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Third-Party Verified	The company conforms with the requirement to seek to understand and manage discharges to air in order to minimise negative impacts on air quality; conformance with this requirement has been verified by government monitoring and regulation.



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2.6	<b>Greenhouse gases</b> Companies emitting more than 25,000 tonnes of CO <sub>2</sub> -equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.	Third-Party Verified	The company is collecting direct and indirect greenhouse emission data, and planning and implementing economic reduction initiatives; this has been verified by a third-party.
2.7	<b>Energy consumption</b> 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.	Third-Party Verified	The company has set targets for energy efficiency and is implementing measures to achieve these; this has been verified by a third-party.
2.8	<b>Tailings management</b> 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 recycling facilities and therefore this requirement does not apply.
2.9	<b>Hazardous waste management</b> 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.	Third-Party Verified	The company has implemented measures to avoid or otherwise manage the handling and disposal of hazardous waste in a manner that minimises negative impacts on human health and the environment; this has been verified by a third-party.
2.10	<b>Non-hazardous and inert waste management</b> 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.	Third-Party Verified	The company has formal measures in place to avoid or otherwise manage the handling and disposal of non-hazardous and inert wastes; this has been verified by a third-party.
2.11	<b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.	Conforming	The company conforms with the requirement to not use substances that are banned under international conventions or European laws.
2.12	<b>Biodiversity protection</b> 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.	Conforming	The company conforms with the requirement to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.
2.13	<b>Protected areas</b> Companies will respect legally protected areas in accordance with local laws and will seek to understand and manage potential impacts of operations on adjacent zones.	Conforming	The company conforms with the requirement to respect legally protected areas in accordance with local laws and understands and manages potential impacts of operations on adjacent zones.
2.14	<b>Closure and reclamation</b> 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	<b>Training</b> 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	The company conforms with the requirement to provide employees and contractors with regular training on environmental issues and management; this has been verified by a third-party.

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## PRINCIPLE 3: Seek continual improvement of health and safety performance

### Overview of Principle Performance

The company conforms with the requirement to develop and implement a health and safety management system and maintain safe and healthy working conditions. It has a transparent and inclusive procedure for reporting health and safety matters to the appropriate authorities that is inclusive and allows workers to provide input. The company formally defines health and safety corrective actions and monitors the effectiveness of such actions. It also conforms with the requirement to provide employees and contractors with health and safety related induction and refresher training as well as visitor safety briefings.

STANDARD		RATING	ADDITIONAL INFORMATION
3.1	<b>Health and safety management systems</b> Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	Conforming	The company conforms with the requirement to develop and implement a health and safety management system.
3.2	<b>Safe working practices</b> 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 conforms with the requirement to 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.
3.3	<b>Incident investigations</b> Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input.	Conforming	The company undertakes and reports to appropriate authority's formal incident investigations using a transparent and inclusive procedure that allows affected workers to provide input.
3.4	<b>Incident follow up</b> 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 formally defines corrective actions and monitors the effectiveness of such actions.
3.5	<b>Training</b> 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 conforms with the requirement to provide appropriate and periodic health and safety training for employees, requires 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.



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## PRINCIPLE 4: Seek continual improvement in labour practices

### Overview of Principle Performance

The company continues to conform with the requirement to develop and implement a formal system to manage labour issues, and risk of discrimination in employment decisions. It also provides fair and equal remuneration. Through meeting strict EU labour laws, it conforms with the requirement to eliminate the risk of forced labour and child labour. The company also conforms with the requirement on working hours and engages formally with all workers on freedom of association and collective bargaining in accordance with EU labour laws.

The company undertakes a range of training activities but could improve its rating through demonstrating that this extends to labour-related practices as defined in the Tin Code and that such training is mandatory for both employees and contractors.

STANDARD		RATING	ADDITIONAL INFORMATION
4.1	<b>Labour management systems</b> Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Conforming	The company conforms with the requirement to develop and implement a formal system to manage labour issues.
4.2	<b>Discrimination</b> 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	The company conforms with the requirement to implement procedures to manage the risk of discrimination in employment decisions.
4.3	<b>Remuneration</b> Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.	Conforming	The company conforms with the requirement to pay workers at or above the local legal minimum and include applicable statutory benefits and equal pay for work of equal value.
4.4	<b>Forced labour</b> Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	The company conforms with the requirement to eliminate the risk of forced labour through compliance with strict EU labour laws.
4.5	<b>Child labour – worst forms</b> 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 conforms with the requirement to prevent the risk of the worst forms of child labour through compliance with strict EU labour laws.
4.6	<b>Child labour – other forms</b> 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	The company conforms with the requirement to prevent the risk of other forms of child labour through compliance with strict EU labour laws.
4.7	<b>Working hours</b> 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).	Conforming	The company conforms with the requirement to comply with local laws and ensure that overtime is voluntary and workers have at least one day of rest for every 7-day period in accordance with EU labour laws.
4.8	<b>Freedom of association and collective bargaining</b> Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	The company conforms with the requirement to engage formally with all workers on freedom of association and collective bargaining in accordance with EU labour laws



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4.9	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Informal	The company undertakes a range of training activities, but to improve its rating it could demonstrate that this extends to labour-related practices (as defined in the Tin Code, Principle 4) and that such training is mandatory for both employees and contractors.
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## PRINCIPLE 5: Engage with stakeholders using a participatory approach

<b>Overview of Principle Performance</b>	<p>The company now has third-party verification for implementing a systematic approach to stakeholder management. This has been achieved through its procedures to identify and assess all internal and external issues for its ISO management systems accreditation (ISO 14001 and ISO 9001). It has also now established a grievance mechanism which provides a clear and transparent framework for addressing grievances.</p> <p>The company continues to conform with the requirement to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities. It undertakes a range of training activities but is progressing to demonstrating stakeholder related training is mandatory for contractors.</p>
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STANDARD		RATING	ADDITIONAL INFORMATION
5.1	<b>Stakeholder management</b> Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	Third-Party Verified	The company has implemented a systematic approach to stakeholder management; this has been verified by a third-party.
5.2	<b>Stakeholder mapping and engagement</b> 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 conforms with the requirement 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.
5.3	<b>Grievance mechanism</b> 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	Company has established an appropriate grievance mechanism.
5.4	<b>Training</b> 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 undertakes a range of training activities, but to improve its rating it could demonstrate that this extends to covering stakeholder engagement and management issues (as defined in the Tin Code principle 5) and that such training is mandatory 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 continues to conform with the requirement for a systematic approach to community management, and consulting and responding to local communities. It now documents its contributions to employment of people from the surrounding region and as such is progressing with monitoring its contributions to local economic development.

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). The company informally considers local community issues in induction and refresher training of employees and contractors.

As a recycling company, free, prior and informed consent (FPIC), land rights, use and access, physical displacement, economic displacement, natural resource use and availability and cultural heritage protection related issues are not relevant requirements.

STANDARD		RATING	ADDITIONAL INFORMATION
6.1	<b>Community and indigenous people management</b> 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.	Conforming	The company conforms with the requirement to take a systematic approach to community management.
6.2	<b>Community health and safety</b> 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	<b>Consultation</b> 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	The company conforms with the requirement to take a systematic approach to consultation and responding to the views of communities.
6.4	<b>Free, prior and informed consent (FPIC)</b> 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	No indigenous peoples are located near to or impacted by the company's operations.
6.5	<b>Land rights, use and access</b> 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	The lands, access to natural resources or cultural heritage of indigenous peoples have not and are not negatively impacted by the company's operations and activities.
6.6	<b>Physical displacement (resettlement)</b> Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Not relevant	The company's operations and activities have not resulted / are not resulting in involuntary resettlement.



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6.7	<b>Economic displacement (livelihoods)</b> 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	The company's operations and activities have not resulted / are not resulting in economic displacement.
6.8	<b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Progressing	The company is progressing with contributing to local economic development through its contributions to employment of people from the surrounding region. To improve its rating, the company could demonstrate it is developing procedures and plans to identify the needs of communities.
6.9	<b>Natural resource use and availability</b> Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.	Not relevant	The company's operations and activities have not had / are not having negative impacts on access to and availability of natural resources by local communities and indigenous people.
6.10	<b>Cultural heritage protection</b> 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.	Not relevant	The company's operations and activities have not had / are not having negative impacts on cultural heritage (this information might be presented in environmental and social impact assessments for the company's operations and activities).
6.11	<b>Training</b> 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.	Informal	The company undertakes limited training relative to community-related issues; to improve its rating the company could demonstrate that induction and refresher training of employees extends to relevant local community issues (as defined in the Tin Code 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 has implemented a systematic approach to human rights and security management through compliance with EU laws. As a recycler it does not source minerals from external parties and therefore standard 7.3 on Responsible Sourcing is not relevant. The company voluntarily undertakes due diligence audit and is in conformance with the Responsible Minerals Assurance Process Tin and Tantalum Standard of 2017 (audit period 1 January 2019 to 31 December 2019). It undertakes a wide range of training activities for its employees and contractors and is progressing but could improve its rating by demonstrating human rights related training is mandatory for both employees and contractors.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	<b>Human rights management</b> Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.	Conforming	The company conforms with the requirement to implement a systematic approach to human rights management through compliance with EU laws.
7.2	<b>Use of private or state security personnel</b> 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.	Conforming	Conformance with the requirement is considered to be addressed through compliance with EU laws.
7.3	<b>Responsible sourcing</b> 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.	Not relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties. The company voluntarily undertakes due diligence audit and is in conformance with the Responsible Minerals Assurance Process Tin and Tantalum Standard of 2017 (audit period 1 January 2019 to 31 December 2019).
7.4	<b>Training</b> 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.	Progressing	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 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 continues to conform with the expectations to ensure major suppliers of secondary materials meet the requirements of the Code through relevant requirements in its "General Conditions of Purchase". It is informally taking steps to positively influence practices of suppliers of goods and services and ensure that expectations are implemented and monitored.

The company does not source minerals from external parties and therefore conformance with standards relating to influencing large and small mineral suppliers of materials are not relevant.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	<b>Suppliers of ASM produced minerals, general</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.2	<b>Principle 1 ASM minerals (compliance and policies)</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.3	<b>Principle 2 ASM minerals (environment)</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.4	<b>Principle 3 ASM minerals (health and safety)</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.5	<b>Principle 4 ASM minerals (labour)</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.6	<b>Principle 6 ASM minerals (communities)</b> Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Not relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.7	<b>Principle 7 ASM minerals (human rights and conflict)</b> 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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Not relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.



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8.9	<b>Suppliers of secondary materials</b> Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code.	Conforming	The company addresses relevant requirements in its Tin Code requirements and General Conditions of Purchase.
8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Informal	The company has informally requested major suppliers of goods and services meet or work towards principles of this Tin Code.



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

### Overview of Principle Performance

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

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	<b>Understanding potential impacts of tin</b> 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 requirement to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	<b>Encouraging safe and appropriate use</b> 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 requirement to regularly support research and innovation and leading collaboration that promotes safe, appropriate and efficient use of tin.
9.3	<b>Communicating appropriate information</b> 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 communicates accurate public information on tin, and the tin industry, 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 Metallo 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 second company report on the Tin Code.

STANDARD		RATING	ADDITIONAL INFORMATION
10.1	<b>Policy Review</b> 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 policy. They actively participated in reviewing and updating policies and procedures when required.
10.2	<b>Communicating reporting information</b> Companies will agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	The management of Aurubis Beerse NV agreed to the publication of this report of activities against the Principles and Standards of the Code.
10.3	<b>Management Review</b> Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	The management of Metallo approved the content of this report.



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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.