

INTERNATIONAL TIN CODE OF CONDUCT REPORT: Rahman Hydraulic Tin Sdn.Bhd



GENERAL INFORMATION		
Company details	Rahman Hydraulic Tin Sdn.Bhd. 33200 Klian Intan, Hulu Perak, Perak Darul Ridzuan, Malaysia	  <p>Visual Progress Guide</p>
Date of this report	April 2019	
Date of previous report	Not Relevant	
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd	
Report verified by	Mr. Madzlan Zam, Senior General Manager	
Contact information	coc@internationaltin.org	
About our company	Rahman Hydraulic Tin Sdn Bhd (RHT) operates hard rock mining and Malaysia’s largest operating open-pit alluvial tin mine at Klian Intan Town, Upper Perak, West Malaysia where it employs around 600 employees. The mine covers 700 hectares, has been in operation since 1907 and contributes around 60% of the current tin production of Malaysia. The use of hydraulic pumps to extract tin ore into the hearth distinguishes Rahman Hydraulic from other mines. RHT mine contributes approximately 8% of the input to its parent company (MSC) smelter and is currently following a strategy aiming to extend mine life and increase production in Perak. RHT is working closely with the Forest Research Institute, Malaysia (“FRIM”) on experimental projects for reforestation and mine rehabilitation. The company does not purchase minerals from any other sources.	
Significant changes from previous report	Not Relevant	
Further information and references	<ol style="list-style-type: none"> Control of Industrial Major Accident Hazards Regulations (CIMA) Annual reports 2017 	

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

Overview of Principle Performance

The company conforms with the expectation to keep up to date business registrations, licences and documents necessary to legally carry out business activity, and has also developed and implemented whistleblowing procedures, including specific guidance on reporting, investigation, follow-up and informant protection. It is making progress in developing and publishing policies to support legal compliance and has developed and implemented elements of a formal management system to manage legal compliance and governance issues which could be developed into a comprehensive approach.

Implementation of the Extractive Industries Transparency Initiative (EITI) is not relevant as Malaysia is not an implementing country, however the company understands potential bribery and corruption risks and is developing procedures to record and address these. Induction training covering some aspects of legal compliance and governance is provided for employees and contractors and progressed could be made to extend the scope to all aspects of this Principle and to ensure full training is also required for contractors.

STANDARD		RANKING	ADDITIONAL INFORMATION
1.1	Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code of Conduct.	Progressing	The company is making progress in developing and publishing policies to support legal compliance and improve practices with respect to the expectations of the Code of Conduct, but some policies have not yet been developed.
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 understands potential bribery and corruption risks and is developing procedures to record and address these, but the procedures are not fully implemented
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 Malaysia 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	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

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	areas.		protection; to improve its rating the company could demonstrate that induction and refresher training of 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		<p>The company has implemented third party verified processes in accordance with Malaysian law to ensure closure and rehabilitation of operations. In addition, it has been evaluated by third party regulators to ensure impacts on land and soil quality are minimised and that good management of hazardous waste is achieved. The company has developed and implemented an environmental management system that conforms with expectations, and it also has conforming practices for the management of water quality and tailings. Some work has been carried out on energy use although the contribution to the reduction of greenhouse gas emissions could be more formally assessed. A significant proportion of energy is met by renewable energy sources and overall the company therefore conforms with the expectation on energy consumption.</p> <p>The company is progressing with the management of air quality, water consumption and reporting on verification of systems for non-hazardous waste control and could further formalise its processes relating to banned substances, biodiversity protection, and protected areas. It provides relevant training to employees and contractors and could take progressive steps to perform training on a regular basis.</p>	
STANDARD		RANKING	ADDITIONAL INFORMATION
2.1	Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	Conforming	
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.	Conforming	
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 is aware of qualitative indicators of land and soil quality and is progressing with measures to minimise negative impacts.
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.	Progressing	The company is collecting air and discharge quality data and has some measures or plans in place to manage discharges to minimise negative impacts on air quality (for example, wet air scrubbers and damping of road surfaces).
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.	Informal	Although the company is aware of quantitative indicators to report energy consumption data, to improve its rating the company could demonstrate that it has implemented (or is continuing to research) the application of tin alloy pellets in reducing fuel consumption (as initially assessed in 2014 and reported in October 2015).
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.	Conforming	

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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.	Conforming	
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.	Third-Party Verified	
2.10	Non-hazardous and inert waste management Wherever possible companies will minimise the production of non-hazardous and inert wastes and consider reuse and recycling options before disposing of them in an appropriate manner.	Progressing	The company has made an assertion of third-party verification Non-hazardous and inert waste management but it is not clear if the online waste statement extend to non-hazardous wastes (both appear to refer to scheduled / hazardous wastes).
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Informal	The company monitors the chemicals its uses, but to improve its rating could implement procedures to routinely compare these and other chemicals it is considering for use with current lists of chemicals banned under international conventions and local laws.
2.12	Biodiversity protection Companies will seek to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.	Informal	The company has identified its environmental impacts based on its environmental policy and general assertions in its Annual Report; 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.	Informal	The company is not operating within legally protected areas and is informally applying measures to manage negative impacts on areas adjacent to legally protected areas.
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.	Third-Party Verified	
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.	Progressing	The company provides employees with induction training and ad hoc refresher / update sessions and suggests contractors do the same with their workers as relevant to Principle 2 and their specific tasks and work areas.

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PRINCIPLE 3: Seek continual improvement of health and safety performance			
Overview of Principle Performance		The company has a transparent and inclusive approach to health and safety incident investigation which is third party verified in accordance with Malaysian law. It has developed and implemented a health and safety management system that conforms with the expectation to provide safe working practices and Incident follow up. The company undertakes a range of training activities for employees and requires the same for contractors, although progress could be made to demonstrate safety briefings for visitors have been completed.	
STANDARD		RANKING	ADDITIONAL INFORMATION
3.1	Health and safety management systems Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	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.	Third-Party Verified	
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 has an "Employee Handbook" which helps it conform with expectations to ensure workers receive fair remuneration, to prevent child labour, and to support freedom of association as also required by Malaysian law. It is progressing towards implementing a labour management system and largely meets expectations on working hours although progress is being made to ensure overtime is fully voluntary. The company recognises the importance of diversity and has a policy to prevent forced labour but the implementation of these commitments is currently informal. The company undertakes a range of training activities although progress could be made to demonstrate these are implemented and reflected in appropriate policies.	
STANDARD		RANKING	ADDITIONAL INFORMATION
4.1	Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Progressing	The company manages most aspects related to labour issues, but to improve its rating the company could implement a formal labour management system to further enhance its control and monitoring activities.
4.2	Discrimination Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Informal	The company's 2017 Annual Report list "Diversity in workplace" as recognised to be of significant importance to the business.
4.3	Remuneration Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.	Conforming	
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Informal	The company has a labour policy with a forced labour clause, but to improve its rating the company could provide evidence of implementation or monitoring.
4.5	Child labour – worst forms Companies will not engage in the worst forms of child labour as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children.	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 largely conforms with the working hours requirements, but overtime is not fully voluntary and therefore the company does not conform.
4.8	Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	
4.9	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company's 2016 Annual Report notes "The establishment of policies and procedures on health and safety, training, equal employment opportunity, human opportunity, staff performance and handling misconduct" as key elements of the Group's internal control systems. It could improve its rating by demonstrating the policy/procedure on training is in place.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach			
Overview of Principle Performance		The company is progressing with the development and implementation of a systematic approach to stakeholder management and already undertakes stakeholder mapping and engages with all stakeholders. It is also progressing with the implementation of a grievance mechanism. The company undertakes a range of training activities although these do not appear to currently extend to stakeholder management.	
STANDARD		RANKING	ADDITIONAL INFORMATION
5.1	Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	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	The company is making progress in stakeholder mapping and is engaging with some stakeholders, including indigenous peoples.
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 is making progress in implementing a systematic grievance mechanism to receive and resolve concerns raised by individuals, workers, communities or civil society organisations.
5.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Inadequate	To improve its rating the company should demonstrate that induction and refresher training of employees extends to stakeholders management related practices (as defined in the ITA 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 is progressing with procedures and plans to manage its impact on community health and safety and contribute to their economic development. The company is informally identifying, analysing, planning and implementing actions designed to with engage local communities, Further evidence would be useful in order to clarify how the company approaches FPIC, minimising adverse impacts on land rights and access, physical displacement and resettlement and protecting cultural heritage. The company could also providing evidence of extending current training activities to matters relating to local communities and indigenous people for both employees and contractors.	
STANDARD		RANKING	ADDITIONAL INFORMATION
6.1	Community and indigenous people management Companies will consider implementing a systematic approach to the management of community and indigenous peoples issues to control and monitor relevant aspects of this Principle 6.	Informal	The company has demonstrated some informal activity relating to community and indigenous people management, but to improve its rating it could develop and implement a systematic approach to community and indigenous people management.
6.2	Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Progressing	The company has implemented measures to manage the risk of impacts on community health and safety through the management of environmental and OHS issues.
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.	Informal	The company consults with a limited focus with local communities and indigenous on industrial incident planning.
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.	Inadequate	It is unclear how the company approaches FPIC; to improve its rating the company could describe whether it has sought the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities and if not develop appropriate procedures and measures to ensure this is done.
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.	Inadequate	It is not clear whether or how the company has implemented procedures and plans for assessing and addressing adverse impacts on land rights, land use and access to land or how it compensates for any residual impacts; to improve its rating the company could describe such procedures and plans if they exist already, or develop and implement them if not.
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.	Inadequate	The company has not yet provided evidence confirming it has avoided the resettlement of people; to improve its performance, the company could provide city planning maps showing that there are no settlements / people present in the area of past, current and planned mining or related activities.
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.	Inadequate	The company has not yet provided evidence that it implements procedures and plans to compensate economically displaced people and has a livelihoods

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			restoration programme to ensure there is no net negative impact; to improve its rating, the company could provide such evidence.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Progressing	The company is contributes to various charitable and welfare groups. This is done to maintain a 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 addressing local economic development.
6.9	Natural resource use and availability Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.	Informal	Company is aware of qualitative indicators of natural resource use and availability and informally applies measures to minimise negative impacts.
6.10	Cultural heritage protection Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimize, mitigate and/or compensate for such impacts.	Inadequate	The company has not yet provided evidence to confirm it has undertaken surveys to demonstrate the absence of cultural heritage in past, current and planned mining areas; to improve its rating the company could provide such evidence, including surveys that demonstrate that the company's operations and activities have not had / are not having negative impacts on cultural heritage.
6.11	Training Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role.	Inadequate	To improve its rating the company should demonstrate that induction and refresher training of employees extends to management of negative impacts on, and contribution to development of, local communities and indigenous peoples (as defined in the ITA 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 complies with local laws regarding the use of private security and is progressing with some measures that align with the Voluntary Principles on Security and Human Rights. It has an informal approach to human rights management and provision of related training for its employees as risks are low in the context of its operations. Conformance with the responsible sourcing standard is not relevant as the company does not source minerals from external parties.

STANDARD		RANKING	ADDITIONAL INFORMATION
7.1	Human rights management Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.	Informal	The company has an informal approach to human rights management and some control and understanding of the issue.
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	The company complies with local laws and has some measures in place that align with 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.	Not Relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	The company undertakes an informal approach to training activities, but to improve its rating it could formalise its system of providing training related to human rights and conflict-related issues for employees and 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 does not source tin containing materials from external parties and therefore conformance with the standards relating to influencing large or small mineral suppliers, or secondary material suppliers are not relevant. It conforms with the requirement of major suppliers meeting or working towards principles of this Code of Conduct as it has put in place measures for evaluating the performance of major suppliers of goods and services.	
STANDARD		RANKING	ADDITIONAL INFORMATION
8.1	Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.	Not Relevant	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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	Conformance with the requirement is considered to be 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 Code of Conduct.	Not Relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.9	Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Code of Conduct.	Not Relevant	Conformance with the requirement is considered to be not relevant as the company does not source secondary materials from external parties.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Conforming	

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

Overview of Principle Performance

Through its membership of International Tin Association, the company conforms with the expectation to 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 in data protection law.

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

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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 Rahman Hydraulic Tin Sdn.Bhd. (RHT) 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 first company report on the Code.

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

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Appendix A – Description of Code reporting

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

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

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

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

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