

INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT. TIMAH



GENERAL INFORMATION		
Company details	PT. TIMAH Jl. Jenderal Sudirman 51, Pangkal Pinang 33121, Bangka, Indonesia	<p>Visual Progress Guide</p>
Date of this report	November 2020	
Date of previous report	October 2019	
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About our company	<p>PT. TIMAH is an Indonesian State-Owned Enterprise established in 1976, which carries out tin mining and smelting as well as other activities. The company is based in Pangkalpinang, Bangka Belitung Province and its operational areas relating to tin are in Bangka Belitung Province and Riau Province. PT. TIMAH has its own on and offshore mining areas, obtains concentrate from local partners in Indonesia, and performs smelting and refining. The company has some plans to expand activities to Nigeria and other countries but does not currently produce or source tin from outside Indonesia. The majority of the tin produced by the company is exported to Asia Pacific countries and Europe, with approximately 5% of the total volume of production being absorbed by the Indonesian domestic markets. It is registered on the London Metal Exchange (LME) under the following brands Banka and Mentok.</p> <p>PT. TIMAH holds ISO 9001, ISO 14001, and ISO 45001 (formerly OHSAS 18001) standards. The company has over 6000 employees in permanent, contract and outsourced roles.</p>	
Significant changes from previous report	<p>This second Code report demonstrates continued improvement in the performance of PT Timah against standards of the Code including further evidence and action on environmental performance. PT Timah has developed a reclamation project to reclaim land whilst positively contributing to community livelihoods. Since the last report, the company has notably achieved improved ratings in:</p> <ol style="list-style-type: none"> 1. Ensuring policies are in place to support legal compliance (1.1) 2. Enhanced training on legal compliance (1.7) 3. Third party verification of offshore water quality (2.2) 	

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	<ol style="list-style-type: none"> 4. Improved understanding of land and soil quality (2.4) 5. Procedures to develop onshore mine management including tailings (2.8) 6. Improved hazardous waste management through potential use as input into other processes (2.9) 7. Progress with training for stakeholder engagement (5.4) 8. More consultation with local communities (6.3) and related training (6.11) 9. Progress on natural resource use and availability (6.9) 10. Progress on protection of cultural heritage (6.10) 11. Evidence of informal management of human rights issues (7.1) and associated training (7.4) 12. Participated in project aimed at improving OHS practices at the ASM level (8.4)
Further information and references	<ol style="list-style-type: none"> 1. 2019 Sustainability Report - https://timah.com/userfiles/post/2006105EE09F9305DAD.pdf 2. 2020 Sustainability Report - https://timah.com/userfiles/post/21031660500E753B2E1.pdf 3. Annual Report 2019 - https://timah.com/userfiles/post/2006105EE09F1E6E321.pdf 4. Annual Report 2020 - https://timah.com/userfiles/post/2103166050097BA4F96.pdf 5. EITI Board decision on the Validation of Indonesia - https://eiti.org/scorecard-pdf?filter%5Bcountry%5D=53&filter%5Byear%5D=2018



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

Overview of Principle Performance

The company achieved the rating of 'Conforming' or 'Third-party verified' in all of the standards for this principle with improvements in policies and training from the previous report. It has developed and implemented a formal third party verified system to manage legal compliance and governance issues as well as quality, environment and health and safety through certification to ISO 9001, ISO 14001, and ISO 45001 (formerly OHSAS 18001) standards. It keeps up to date all licences and documents to maintain legal compliance and has policies in place to support and improve practices. The company has procedures in place to avoid bribery and corruption and establish and implement whistleblowing and reports taxes and royalties paid under the EITI. It also developed undertakes a range of training for employees and contractors on legal compliance.

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.	Third-Party Verified	
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.	Conforming	
1.5	Transparency Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government.	Conforming	
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.	Conforming	

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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 through that standards for water quality and air quality are also third-party verified. This includes new evidence relating to offshore water quality management since the previous report. The standard for on-shore closure and reclamation are also third-party verified with progress being made with off-shore reclamation. The company now also conforms with the standards for hazardous waste management, land and soil quality, while continuing to informally demonstrate qualitative awareness of the significance of its water consumption relative to water availability and impact on the local water need. It has been progressing with collecting greenhouse emission data since 2014 and tracking absolute emissions and emissions per tonne of product and could use this data to set energy reduction targets. It is progressing with efforts to manage the storage or disposal of tailings through implementation of a mine management plan although those onshore tailings are already used during reclamation activities. Inert offshore tailings are returned back to the area of extraction in conformance with the standard. The company is collecting biodiversity-related data and has some formal measures in place to manage its negative impact on critical natural habitats, as well as non-hazardous waste management on-shore, although more work could be done off-shore. It is also making progress in demonstrating avoidance of operating in protected areas. The company could formalise monitoring of the use of banned substances and is progressing with a range of mandatory environmental training.

STANDARD		RATING		ADDITIONAL INFORMATION
2.1	Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	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 ¹	Third-Party Verified ²	
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.	Informal		The company has a qualitative awareness of how significant its water consumption is relative to water availability, and informally considers wider local needs.
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.	Conforming		
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		

¹ 2.2 Water quality - Terrestrial

² 2.2 Water quality - Offshore

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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.	Progressing		The company has collected greenhouse emission data since 2014 and is tracking absolute emissions and emissions per tonne of product.
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 is in the process of acquiring more detailed information on energy consumption, but to improve its rating it could use this baseline to underpin energy saving targets and initiatives.
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.	Progressing ³	Conforming ⁴	Terrestrial: The company has procedures in place to develop mine management plans for onshore operations, but to improve its rating it could provide evidence of a mine management plan that has been developed and implemented.
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 ⁵	Conforming ⁶	

³ 2.8 Tailings management - Terrestrial

⁴ 2.8 Tailings management - Offshore

⁵ 2.9 Hazardous waste management - Terrestrial

⁶ 2.9 Hazardous waste management - Offshore

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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 ⁷	Inadequate ⁸	<p>Terrestrial: The company has some measures or plans in place to manage the generation, reuse, and recycling of non-hazardous and inert wastes, including the composting of organic wastes for reuse within its operations.</p> <p>Offshore: To improve its rating the company could demonstrate it returns non-hazardous and inert wastes from offshore activities to a terrestrial location and considers reuse and recycling options before disposing of them in an appropriate manner.</p>
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.	Progressing ⁹	Inadequate ¹⁰	<p>Terrestrial: The company is collecting biodiversity-related data and has some formal measures or plans in place to manage negative impacts on critical natural habitats through closure planning and rehabilitation of disturbed sites.</p> <p>Offshore: It is unclear whether and how the company's offshore activities affect critical natural habitats; to improve its rating the company could define the location of such habitats relative to its operations and confirm that tailings disposal in the offshore environment does not negatively impact critical natural habitats.</p>
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.	Progressing ¹¹	Progressing ¹²	<p>Terrestrial: The company is not operating within legally protected areas and has some formal measures or plans to manage negative impacts when working in areas adjacent to legally protected areas</p> <p>Offshore: The company does not extract from protected offshore areas; to improve its rating, the company could present evidence confirming the dispersal of tailings does not negatively impact such areas.</p>

⁷ 2.10 Non-hazardous and inert waste management - Terrestrial

⁸ 2.10 Non-hazardous and inert waste management - Offshore

⁹ 2.12 Biodiversity protection - Terrestrial

¹⁰ 2.12 Biodiversity protection - Offshore

¹¹ 2.13 Protected areas - Terrestrial

¹² 2.13 Protected areas - Offshore

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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 ¹³	Progressing ¹⁴	Offshore: The company is making progress in the effective reclamation of offshore areas, including the use of coral reef creation initiatives; to improve its rating for offshore activities, it could implement the additional measures noted for SOPs 2.8, 2.9 and 2.10.
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 undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to environment-related issues and management (as defined in the Code of Conduct, Principle 2) and that such training is mandatory for both employees and contractors.

¹³ 2.14 Closure and reclamation - Terrestrial

¹⁴ 2.14 Closure and reclamation - Offshore



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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company achieved the highest achievable possible rating of “Third-party verified” for all the standards for this principle. Having ISO 45001 accreditation demonstrates it has in place a robust management system to maintain and continually improve health and safety practices, incident reporting, investigation and follow-up for staff, contractors, and visitors to its sites. Through the management system it also identifies training needs for employees, contractors and 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.	Third-Party Verified	
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.	Third-Party Verified	
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.	Third-Party Verified	
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.	Third-Party Verified	

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PRINCIPLE 4: Seek continual improvement in labour practices			
Overview of Principle Performance		The company conforms with the requirement to develop and implement a formal system to manage labour issues by having an 'Employee Handbook'. The Handbook sets out the company's commitment to remuneration, working hours, and freedom of association and these commitments are clearly implemented. The Handbook also states that the company does not condone risks that it would not normally foresee, such as forced and child labour in its operations, and discrimination, but could further formalise how these aspects of the Handbook are delivered through developing and implementing formal policies and procedures. Training is similarly provided informally and could be more formalised for both staff and contractors.	
STANDARD		RATING	ADDITIONAL INFORMATION
4.1	Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Conforming	
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 states that it complies with local laws the prohibit discrimination, but to improve its rating needs to demonstrate how anti-discrimination is practically implemented in the workplace through policies and procedures and positive outcomes effectively monitored.
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 states that it does not use, support, or condone forced labour and considers this issue unlikely to occur in the context of its operations. It can improve its rating by developing and implementing policies and procedures to ensure its own employees, contractor staff and workers hired through third parties do not meet any of the criteria that characterise forced or compulsory labour.
4.5	Child labour – worst forms Companies will not engage in the worst forms of child labour as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety, or morals of children.	Informal	While the company states that it does not employ persons under the age of 18 (in compliance with local laws) and considers this issue unlikely to occur in the context of its operations, it can improve its rating by developing and implementing procedures to routinely determine the age of job applicants, ensuring only adults are employed.
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.	Informal	While the company states that it does not employ persons under the age of 18 (in compliance with local laws) and considers this issue unlikely to occur in the context of its operations, it can improve its rating by

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			developing and implementing procedures to routinely determine the age of job applicants, ensuring only adults are employed.
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).	Conforming	
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.	Informal	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to labour-related practices (as defined in the International Tin Code of Conduct, 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

Overview of Principle Performance

The company conforms with the expectation to establish an appropriate grievance mechanism to receive feedback from stakeholders. Stakeholder mapping is underway as part of some of the third-party verified management systems the company has in place and progress is being made on these processes which could be more formalised in written procedures or documentation. The company is also progressing in engaging more actively with all stakeholders and is now also making progress in training practices in this regard.

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	The company has undertaken some stakeholder mapping and is engaging with some stakeholders; to improve its rating it could implement measures to ensure all stakeholders are engaged, including disadvantaged and vulnerable groups.
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	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on stakeholder engagement and management issues (as defined in the Tin Code of Conduct, Principle 5) 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 has implemented procedures and plans to consult with and identify the development needs of communities and indigenous peoples and contribute to their economic development, including through social and environmental programmes conforming to the standard. It also has processes in place to inform local communities, including fishermen and informal or illegal offshore miners of the need to maintain a safe distance from operational off-shore vessels and equipment, and is making progress in measures to manage the impacts on on-shore community health and safety. Since the last report the company is now progressing to minimise impacts on natural resource availability and protection of cultural heritage and is informally implementing training on these standards. It is informally identifying, analysing, planning and implementing actions designed to with engage local communities and indigenous peoples interested in its operations, or affected by the company and its processes, and the company is known to engage in a range of local consultations on an ad-hoc basis. The company could formalise several activities including free, prior, and informed consent, land rights, use and access, physical and economic displacement further.

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 people's 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 ¹⁵	Conforming ¹⁶	Terrestrial: 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 it could implement additional management measures to address residual health and safety issues missing from 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.	Informal		The company informally consults on an ad hoc basis with local communities and indigenous peoples; to improve its rating, the company could implement a systematic approach to consultation and responding to the views of communities and indigenous peoples.
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.

¹⁵ 6.2 Community health and safety - Terrestrial

¹⁶ 6.2 Community health and safety - Offshore



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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 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.	Conforming	
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.	Progressing	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.	Progressing	Company is aware of its impact on the sustainability of a natural resource conservation area and/or the protection of 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.	Informal	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to local community and indigenous peoples issues (as defined in the International Tin Code of Conduct, Principle 6) and that such training is mandatory for both employees and 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 Indonesian laws in relation to the use of security personnel and informally follows the Voluntary Principles on Security and Human Rights. It considers that human rights issues are unlikely to occur within the context of its operations and has now provided evidence to show it informally manages most aspects of human rights and conflict issues. Aside from its own production, the company sources some minerals from its close partners within Indonesia which, through informal assessment, the company does not consider is a conflict affected or high-risk area. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, the 2018 on-site audit did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources. The company now informally provides training on human rights and conflict-related issues to both its employees and contractors and it could further ensure this is mandatory.

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.	Informal	The company informally manages most aspects related to human rights and conflict issues, but 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.	Informal	The company complies with local laws and informally follows the Voluntary Principles on Security and Human Rights; to improve its rating it could implement a systematic approach to implementing the Voluntary Principles for its direct and contracted security workers.
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.	Informal	Aside from its own production, the company obtains some minerals from its close partners within Indonesia which, through informal assessment, the company does not consider are linked to conflict or human rights abuses. The company is RMAP compliant, but that 2018 on-site audit has not evaluated the company's assessment of supply risks that would trigger the need for OECD due diligence.
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 a wide range of training activities, but to improve its rating it could demonstrate that this extends to human rights and conflict-related issues (as defined in the International Tin Code of Conduct, Principle 7) and that such training is mandatory for both 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 participated in an EPRM funded Tin Working Group Project in Bangka Belitung, aimed at improving OHS practices at the ASM level. The company has formally established and implemented processes for requesting all suppliers of ASM produced minerals to declare they will work towards understanding their supply chain and communicating the objectives of the Code. It has also made progress on engagement with suppliers of goods and services regarding the principles of the Code. It undertakes various informal efforts to communicate to ASM suppliers' specific information on the need for compliance, environmental management, and avoiding human rights abuses and conflict, although evidence to confirm it has made formal attempts to engage suppliers of ASM produced minerals on managing labour issues within their own supply chains is not available. Further clarification of whether sources include any large-scale mineral producers and relevant communication could be provided.

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.	Conforming	
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.	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on formalisation; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
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.	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on the management of environmental impacts; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
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.	Conforming	
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.	Inadequate	The company has not yet provided evidence to confirm it has made informal attempts to engage suppliers of ASM produced minerals and distribute relevant guidance on managing labour issues.
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.	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on negotiating with local communities and indigenous peoples; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.

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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.	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on serious human rights abuses and conflict-related issues; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Inadequate	The company has not yet provided evidence to clarify whether it has major suppliers of LSM produced minerals, and if so whether requests have been made to suppliers to 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	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.	Inadequate	To improve its rating, the company could demonstrate it has requested major suppliers of goods and services meet or work towards principles of this Code of Conduct.



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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 law.

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 PT. Timah 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 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.