

# Mineral Supply Chain Due Diligence Assessment Summary Report

Assessed Party	China Tin Smelter Co. Ltd.
Assessment Date	11/23/2023-11/24/2023
Assessed Material	Tin
LME-listed Brand	ЈН
Assessment Type	☑Main Assessment
Assessment Result	✓A
Assessment Firm	China Standard Conformity Assessment CO., LTD (CSCA)
Assessor	



#### Instruction

## **Objective**

This assessment program is an independent third-party assessment conducted by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) based on <u>Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)</u>, aiming to assess the performance of the company's due diligence management system and process, and support the company to identify the gaps that need further improvements and develop corresponding improvement measures.

#### **Basis of the Assessment**

The assessment is based on *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, hereinafter referred to as *the Guidelines*. The companies shall meet the content of "Companies should" in *the Guidelines*. "Companies should" refers to specific requirements of *the Guidelines* for companies due diligence management, as well as the specific refinement of the requirements, which is consistent with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition).* 

#### **Explanation of Conformity Degree**

**Conformity**: Indicates that the company's management system, policies, procedures or processes meet the requirements of corresponding provisions of *the Guidelines*.

**Need improvement**: Indicates that the management system, policies, procedures or processes partially meet the requirements of corresponding provisions of *the Guidelines*, but lack some necessary elements or content, or can not prove or lack evidence to prove that they are substantively functional, and further measures are needed to improve its performance.

**Non-conformity**: Indicates that the company's management system, policies, procedures, or processes cannot meet the requirements of corresponding provisions of *the Guidelines*, resulting in systematic and repetitive non-conformities.



**Not applicable**: Indicates that corresponding provisions of *the Guidelines* do not apply to the Company.

**Zero tolerance**: If any of the following situations occurs, it is a "zero tolerance" situation.

- 1. Misrepresentation, deliberately forging false evidence or vouchers;
- 2. Any form of support for illegal control, or illegal taxation and extortion by non-state armed groups;
- 3. Any form of torture, cruel, inhuman and degrading treatment;
- 4. Directly cause or contribute to forced or compulsory labor;
- 5. Cause



items does not exceed 10% of all applicable items.

Level B: the percentage of "Need improvement" items does not exceed 35% of all applicable items, and the percentage of "non-conformity" items does not exceed 20% of all applicable items.

Level C: The above level cannot be reached or there is any "zero tolerance" situation.

## **Description of Assessment Type**

The assessment is divided into main assessment and tracking assessment. The main assessment needs to be carried out once a year. The tracking assessment is conducted every six months or during the re-assessment (main assessment) based on the conformity degree and assessment results.



# 1. Assessed Party



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Cos than 12 months.	

# 4. Summary of Assessment Results

<b>Assessment Result</b>	Α
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Step 1: Establishing A Corporate Due Diligence System				
Develop and adopt due diligence policy.	The Company has formulated and approved the Policy for Responsible Mineral Supply Chain, which			
zeverep und duspt dus dingenee pointy.	is in line with the requirements of the Chinese Due Diligence Guidelines for Mineral Supply Chain.			
Structure appropriate internal	The Company has established a working group for supply chain management; and due diligence			
management systems.	management responsibilities are signed to relevant management and employees.			
Establish a system of controls and	The Company has established a supply chain control and transparency system to collect and			
transparency over the supply chain.	understand mineral supply chain information.			
Strengthen engagement with suppliers.	The Company has formulated the <i>Contract Terms of Responsible Supply Chain</i> and incorporated them into the supplier cooperation agreement. In addition, the Company also requires suppliers to sign the <i>Supply Chain Policy</i> and <i>the Responsible Mineral Supplier Code of Conduct</i> to ensure that suppliers comply with policies in consistent with due diligence policy. The Company assisted suppliers in joint capacity building and conducted online suppliers training with the theme of Supply Chain Policy for Responsible Mineral to improve their due diligence capabilities and performance level.			
Establish a company level grievance mechanism and/or participate an industrial level grievance mechanism.	The Company has established and published the <i>Grievance Procedure of Responsible Mineral Supply Chain</i> to provide a channel for stakeholders to express their concerns.			



Step 2: Risk Identification and Assessment				
Conduct warning signs review, and identify the scope of the risk assessment of the mineral supply chain based on the results of warning signs review.	The Company has developed <i>Procedure for Identification of Conflict Affected and High-Risk Areas</i> ( <i>CAHRAs</i> ), conduced supplier warning signs review. The Company has implemented information verification procedure; and information has been verified through <i>Know Your Supplier</i> ( <i>KYS</i> ) <i>Questionnaire</i> . However, the Company needs to further strengthen its efforts in mineral supply chain traceability and risk identification measures.			
When warning signs are identified, companies shall conduct an on-the-ground assessment of the corresponding supply chain.	During this assessment period,			
Assess risks in the supply chain.	The Company carried out tin supply chain risk assessment and completed the Supply Chain Risk Assessment Form.			
Step 3: Risk Prevention and Mitig	gation			
Report risk assessment results internally.				
Develop and adopt risk management plan.	The Company has formulated and approved the <i>Risk Management Plan of Responsible Mineral Supply Chain</i> , which covers mitigation strategies and risk reduction measures to address different types of risks.			
Implement risk management plan, monitor and track performance of risk mitigation strategies.	The Company has formulated a <i>Monitoring Form for the Implementation of Risk Management Plan</i> to supervise and track the implementation and effectiveness of the <i>Risk Management Plan</i> on a regular basis. During the implementation of the <i>Risk Management Plan</i> , the Company needs further strengthen communication and cooperation with relevant parties such as suppliers, peer companies and industry organizations to jointly promote tin supply chain partners to continue to improve their due diligence performance.			



Supplementary assessment of risks that need to be mitigated. Supplementary assessment can also be conducted after actual circumstances have changed.

The Company requires that, after the implementation of *Risk Management Plan*, when the actual situation or the supply chain changes, risks that need to be mitigated will be further monitored and re-assessed.

### **Step 4: Internal and External Assessment**

Companies should establish internal assessment system, to continuously monitor and manage due diligence performance.

The Company has established an internal assessment team, and carried out the internal assessment. However, further improvement is needed in terms of establishing an internal assessment system and formulating the



Step 6: Provide for or Cooperate in Remediation When Appropriate			
When the company recognize that it has			
caused or contributed to actual adverse			
impacts, they should mitigate these	N/A		
impacts by providing for or cooperating			
in remediation when appropriate.			
Companies provide conditions or			
cooperate with existing remedial	N/A		
mechanisms in a timely manner.			