



MAPPING ITSCI INFORMATION &
TIN CODE STANDARD 7.3 CRITERIA



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Introduction

The ITSCI Programme supports, facilitates, and enables companies to carry out due diligence through our standards and implementation which are [fully aligned](#) with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA). While every individual company remains responsible for their own due diligence according to their own circumstances, ITSCI is an upstream joint initiative through which industry members can cooperate regarding due diligence, including by engagement of local stakeholders. ITSCI offers Full Membership to tantalum, tin and tungsten smelters, to other upstream companies up to the mine level, and Associate Membership to downstream companies. ITSCI does not provide assurance or certification. The scope of ITSCI is described [online](#).

As part of our work, ITSCI gathers, collates, evaluates and reports information to ITSCI members according to our information and data release policies. Members receive a range of information from ITSCI related to every Step of the OECD Guidance which they may evaluate and use according to their own determination. Smelters are considered by OECD as the ‘pinch point’ in 3T supply chains and, if sourcing from CAHRA, are expected to undergo an independent audit according to Step 4 which may be supported by any separate smelter level initiatives. ITSCI aims to provide [general guides to ITSCI members regarding how ITSCI information may map to smelter audit requirements](#) of those initiatives. The [first guide was against Responsible Minerals Assurance Process](#) (RMAP 2017). This document provides mapping against the ITA-RMI Assessment Criteria for Tin Smelting Companies as recommended for use under the [Tin Code Standard 7.3](#) (Responsible Sourcing).

Tin code standard 7.3 (responsible sourcing) and assurance process

The [Tin Code](#) is the global environmental, social and governance (ESG) standard and transparent reporting mechanism proactively and voluntarily adopted by the tin industry. It offers tin exploration projects, mining, smelting and recycling operations the opportunity to demonstrate a commitment to continuous improvement and transparency. The Tin Code comprises 71 standards grouped under 10 ESG Principles with one of those, **Standard 7.3 Responsible Sourcing**, reporting on independently verified company implementation of OECD-recommended supply chain due diligence.

At the smelter level, Tin Code expects companies to evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement. The criteria recommended for standard 7.3 is the ITA-RMI Assessment Criteria for Tin Smelting Companies v2 (Mar 2021) referred to as **Criteria 7.3**. This document maps the potential for smelters to use ITSCI information in relation to that Criteria 7.3.

In common with ITSCI, RMAP and other initiatives, the Tin Code assurance process does not result in a material certification, nor does it determine that the material at the auditee is conflict-free.

This mapping document was developed by ITSCI with input on the Tin Code Standard 7.3 and associated Criteria 7.3 provided by ITA.

General guide to tin code criteria 7.3

In considering how ITSCI information may be used to support smelter due diligence it may be useful to note some general points regarding Criteria 7.3.

Criteria 7.3 is laid out according to the ‘Steps’ of the OECD Guidance. In April 2021, an independent Alignment Assessment of Criteria 7.3 was published confirming its “Fully Aligned” or 100% score for ‘policies and standards’ aspects against the OECD Guidance.

Criteria 7.3 incorporates some additional expectations arising from the EU Regulation 2017/821 on ‘conflict minerals’ as well as requirements related to Section 1502 of the Dodd Frank Act. ITSCI also supports those additional expectations as relevant.

Criteria 7.3 identifies for which requirements companies may make use of aligned joint initiatives and what actions companies should take to review information from such initiatives. ITSCI qualifies as **aligned joint initiative** under Criteria 7.3.

Criteria 7.3 identifies which requirements apply to all smelting companies and which apply only in the case that smelters identify ‘minerals known or suspected to be from CAHRA’ (conflict affected and high-risk areas). The latter is the situation that is relevant to ITSCI supply chains from CAHRA and those additional requirements are ‘enhanced due diligence’.

In alignment with the OECD Guidance, the Criteria 7.3 aims to incentivise and improve supply chain due diligence including for artisanal and small-scale mining areas by encouraging continual, proactive, continual and ongoing due diligence. ITSCI provides support via our on-the-ground assessment teams as well as other actions.

Tin code criteria 7.3 & ITSCI information

The below table was developed by adapting the Tin Code Criteria 7.3 to ITSCI information and tools. In the table, the two columns on the left contain text extracted from the public Criteria 7.3 for reference purposes. The two columns on the right indicate in which situations and how smelters can use ITSCI information to demonstrate fulfilment of each relevant Criteria requirement. Not all items of Criteria 7.3 can be supported by ITSCI. In all situations, companies remain fully responsible for their own due diligence and to ensure joint work (such as via ITSCI) is relevant to their own circumstances and supply chains, including smelter actions in response to risks.

ITSCI documents are listed in order of relevance against each expectation as one or more documents may provide relevant information in each case. This list is not exhaustive, other documents may be provided by ITSCI which are not included in the table below although providing information for OECD due diligence.

Supporting ITSCI Documents

The below is a non-exhaustive list of ITSCI documents which smelters can use to demonstrate fulfilment of each relevant Tin Code Standard 7.3 Criteria requirement (in green). More details can be found in the table Tin code criteria 7.3 & ITSCI information, from page 4.

Alignment Assessment - *IV:b, 2B:a, 3B:1*

ITSCI Membership list - *IV:c, 1C:3.2, 1C:3.5, 1C:9, 1C1-4:5, 1D:2, 1D:4, 1D:6*

ITSCI Factsheet - *IV:d, 1E:a, 2B:a*

ITSCI site audit reports – *IV:e*

ITSCI Improvement action plan - *IV:f*

ITSCI Pre-Audit on your company - *1A:2, 1A:3, 1A:4, 1A:5, 1A:6, 1A:7, 1B:1, 1B:2, 1B:5, 1B:6*

ITSCI shipment reports - *1C:2.2, 1C:2.3, 1C1-4:1.5, 1C1-4:1.6, 1C1-4:1.7, 1C1-4:1.8, 2B:2*

ITSCI Know Your Supplier (KYS) Forms - *1C:2.4, 1C:3.2, 1C:3.3, 1C:3.5, 1C1-4:1.4*

ITSCI incident summaries - *1C:2.4, 1C:2.5, 1C1-4:1.2, 1C1-4:1.3, 1C1-4:2, 1D:5, 1D:6, 1E:2, 2A:3.2, 3B:2, 3B:3, 3B:4, 3B:5, 3B:6, 3C:1, 3C:2, 3C:3, 3D:1*

ITSCI Audits - *1C:9, 1C1-4:1.1, 1C1-4:5, 1D:5, 1D:6, 4B:2*

ITSCI ‘C’ forms - *1C1-4:1.1, 1C1-4:2, 2B:3*

ITSCI baseline reports - *1C1-4:1.6, 1C1-4:1.8, 1C1-4:1.9, 1C1-4:2, 2B:3*

ITSCI Data and Information release - *1C1-4:c*

ITSCI monthly reports - *1D:d, 1E:1, 2A:3.1, 2B:1, 3B:6,*

ITSCI quarterly and annual reports - *1D:5, 3B:5, 3C:4, 2B:1*

ITSCI Quarterly Data Summaries - *1D:d, 2A:3.1*

ITSCI Due Diligence list - *2A:3.2*

ITSCI whistleblowing mechanism - *1E:1, 3C:4*

ITSCI Annual incident review - *2B:a, 3B:1*

ITSCI News and Stories from the field - *2B:1*

Tin Code Criteria 7.3 text		ITSCI Programme	
Criteria		Relevant ITSCI documents & information	Use by smelters: guidance
Using Joint Industry Initiatives / Upstream Mechanisms			
	a) The alignment of the standards of the joint initiative or institutionalised mechanism with the OECD Guidance;	Alignment Assessment (June 2023) on ITSCI standards; results show 100% alignment of ITSCI standards with overarching due diligence principles (Section A), and 100% alignment of ITSCI standards with the five-step framework (Section B).	Review the Alignment Assessment and record your confirmation that ITSCI achieves scores for <u>standards</u> above the Criteria defined threshold (80% for Fully Aligned).
IV:b	b) The alignment of the implementation by the joint initiative or institutionalised mechanism of their standards	Alignment Assessment (June 2023) on ITSCI implementation; results show 100% alignment of ITSCI implementation with overarching due diligence principles (Section A), and 88% alignment of ITSCI implementation with the five-step framework (Section B).	Review the Alignment Assessment and record your confirmation that ITSCI achieves scores for <u>implementation</u> above the Criteria defined threshold (80% for Fully Aligned).
IV:c	c) The company and/or suppliers' participation in the aligned joint initiative or institutionalised mechanism;	ITSCI membership list; the list is updated regularly online as status of participant's membership's change. The list is also provided as part of the monthly report.	Review the member list and record whether your own company, your immediate suppliers such as traders, and in-region exporters were <u>approved Full Members of ITSCI during relevant time periods</u> of trading. That demonstrates those companies are working to (at least) the same ITSCI standards and implementation processes.
IV:d	d) Review by the company of information provided by the aligned joint initiative or institutionalised mechanism to confirm relevance to their own circumstance;	Mapping ITSCI information & ITA-RMI Tin Criteria expectations: this document describes what information is available to you ITSCI Factsheet: confirms the scope of the ITSCI Programme	Review the listed documents and record <u>whether the scope of ITSCI is relevant to your company circumstances, supply chains and needs</u> ; including geographic areas, types of minerals covered, actors upstream (if ITSCI members/participants) and therefore their use of ITSCI to facilitate due diligence. Knowing and understanding what information is available from ITSCI helps you determine the relevance to your supply chain and whether you can reasonably make use of ITSCI information for your on-going due diligence.
IV:e	e) Review by the company of a sample of suppliers' performance as independently audited by the aligned joint initiative or institutionalised mechanism.	ITSCI site audit reports on participating members	Record whether ITSCI provides independent <u>audits of a sample of your immediate suppliers</u> such as traders, and in-region exporters which you can use for their due diligence performance review.
IV:f	f) Identify and address any gaps in the activities of the initiative or	Documents listed in IV:a to IV:e above	Review the results of your company evaluations in IV:a to IV:e above , identify any gaps in implementation and information

	mechanism which are relevant to their own circumstance in order to ensure risks throughout the supply chain are being reasonably managing.	ITSCI improvement action plan: describes ITSCI actions to achieve continual improvement taking into account the Alignment Assessment (June 2023). The current version of the plan is for the period 2024-2025.	provided by ITSCI compared to your company needs and circumstances, <u>write and implement a plan to fill any identified gaps</u> . That is necessary so your company can ensure all relevant requirements are being met to reasonably manage supply chain risks. You can also refer to ITSCI's own improvement plan to fill any gaps in Alignment Assessment.
OECD Step 1: Establish Strong Company Management Systems			
1A:1	Adopt a written supply chain policy.	Not Applicable	It is a company responsibility to produce a company supply chain/conflict mineral policy.
1A:2	Include in the policy the standards against which the company will make assessments of itself and its suppliers' activities	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your policy; including clear <u>statements explaining your company supply chain risk standards</u> (which may be OECD Annex II per 1A:3)
1A:3	Ensure the policy and standards are consistent with those in the Annex II model supply chain policy or equivalent, including timescales for disengagement or progressive improvement through mitigation	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your policy; including a) adopting by referring OECD Annex II as a company standard and <u>listing out Annex II risks</u> b) explaining <u>your company strategy</u> to respond to risk (continued trade, suspension, disengagement) <u>and c) time you allow</u> for improvement of situations.
1A:4	Include in the policy a description of the management process for identifying and managing risks	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your policy; including on <u>explanation of your management processes</u> to identify and manage risks
1A:5	Include in the policy a commitment to the due diligence steps relevant to its supply chain and operations	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your policy; including statements on <u>whether your company buys from CAHRA</u> (ITSCI countries) and therefore that your company <u>applies all 5 steps</u> of OECD due diligence. The 5 Steps include all expectations for 'enhanced' due diligence.
1A:6	Ensure the policy covers all types of tin minerals and materials relevant to company activities	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your policy; including a statement that <u>confirms your company buys minerals</u> (and not only secondary recycled materials) and

			therefore that your company applies all 5 steps of OECD due diligence.
1A:7	Have and implement a process for periodically reviewing the policy and updating as necessary	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement of your policy; including <u>dating, signing by senior manager, regularly reviewing</u> (at least annually) and re-dating and re-signing.
1A:a	Referring to policies, commitments and processes submitted to, and evaluated by, an aligned joint initiative	Documents listed in 1A:2 to 1A:7 above	See details explained in 1A:2 to 1A:7 above
1B:1	Assign responsibility for each part of the due diligence management process to appropriate staff	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your due diligence management plan; including the allocation of due diligence <u>roles and responsibilities</u> to appropriate staff and senior management <u>for every relevant due diligence step</u>
1B:2	Provide authority to staff at a senior level to oversee due diligence	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your due diligence management plan; including responsibilities of individuals in <u>senior management roles to oversee</u> company due diligence and make significant <u>decisions</u>
1B:3	Ensure responsible employees have sufficient knowledge and experience of due diligence including through relevant training	Not Applicable	It is a company responsibility to identify staff with sufficient knowledge and experience for due diligence roles and to allocate resources for their training.
1B:4	Allocate resources and staff for due diligence operation and monitoring	Not Applicable	It is a company responsibility to determine and provide an appropriate budget and other resource to implement due diligence
1B:5	Implement communication processes to ensure that critical information – including the company supply chain policy, management processes and information on risks – reaches relevant employees and suppliers, and	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your due diligence management plan; including your communication planning to ensure your policy, management process and risk information reaches <u>employees and suppliers</u> for their action
1B:6	Put in place accountability for employees expected to perform due diligence	ITSCI Pre-Audit on your company: generated at the time of ITSCI Full Member approval	Review your company's membership pre-audit including any recommendations made by ITSCI for improvement on your due

			diligence management plan; including how <u>employees in due diligence roles will be held accountable</u> for failures in performing their responsibilities
1B:a	Referring to management plans submitted to, and evaluated by, an aligned joint initiative.	Documents listed in 1B:1, 1B:2, 1B:5, 1B:6 above	See details explained in 1B:1, 1B:2, 1B:5, 1B:6 above
1C:1	Obtain and retain information for red flag review	Not Applicable	It is a company responsibility to obtain and keep information on minerals received
1C:2.1	Description of mineral type, including for by-products	Not Applicable	It is a company responsibility to keep records describing the minerals received such as metal content, appearance, grade and similar
1C:2.2	The stated mineral origin (location of extraction, country or regional mining area within a country)	ITSCI shipment reports: provided for each lot of mineral confirmed by the smelter to have been received on site. Reports include; • List of all associated mines of origin	In addition to company trading documentation, you may also identify the mineral origin (<u>country, province and territory of extraction</u>) from records shown in the ITSCI Shipment Reports. Note that details in ITSCI Shipment Reports are intended for the more extensive traceability requirements in 1C1 to 1C4 beyond red flag review.
1C:2.3	Quantities and dates of extraction, <u>if available</u> , expressed in volume or weight. Note: not all suppliers will have this information available	ITSCI shipment reports: provided to the smelter for each lot of mineral confirmed by the smelter to have been received on site. Reports include; • Weights and type of minerals	You can confirm that <u>quantities and dates of extraction</u> at the mine are recorded in the relevant ITSCI Shipment Report. Note that details in ITSCI Shipment Reports are intended for the more extensive traceability requirements in 1C1 to 1C4 beyond red flag review.
1C:2.4	Countries through which minerals have transited (in sealed shipping containers)	ITSCI Know Your Supplier (KYS) Forms include info on transit countries ITSCI incident summaries: reporting any discrepancies on information collected from exporters, traders and smelters	In addition to company trading documentation, and any relevant ITSCI KYS forms, any unresolved discrepancies in information held by ITSCI on <u>transit countries</u> between export and smelter would be identified as an incident. Your company would be alerted to such incidents related to shipping and if so, this should be recorded.
1C:2.5	Countries through which minerals have been transported (not in sealed shipping containers), or in which they have been reprocessed, repacked or handled	ITSCI incident summaries: reporting any discrepancies on information collected from exporters, traders and smelters.	In addition to company trading documentation, and any relevant ITSCI KYS forms, any unresolved discrepancies in information held by ITSCI on <u>transport countries</u> between export and smelter would be identified as an incident. This includes <u>intermediary countries</u> of potential handling and repacking of shipments. Your company would be alerted to such incidents related to shipping and if so, this should be recorded.

1C:3.1	Name, addresses and type of business of immediate suppliers	Not Applicable	It is a company responsibility to keep records of immediate suppliers and other known actor names, addresses, types of business
1C:3.2	Aggregated lists of countries in which the supplier has shareholder or company interests	<p>ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including checks on shareholders and associated companies.</p> <p>ITSCI Know Your Supplier Forms: includes self-declared information on countries of associated shareholder interests.</p>	In addition to your company's own KYS checks on immediate suppliers and other known actors, you can obtain from ITSCI the exporter's self-declared KYS forms if your smelter is in a proven business relationship with that exporter. Other shareholder information on all ITSCI members is recorded in the membership list. This information can form part of your company records regarding <u>shareholder associated countries</u> .
1C:3.3	Aggregated lists of countries of origin, transport and transit of minerals from which suppliers have sourced over the last 12 months	ITSCI Know Your Supplier Forms: includes self-declared information on countries of origin of minerals traded in the last 12 months.	In addition to your company's own KYS checks on immediate suppliers and other known actors, you can obtain from ITSCI the exporter's self-declared KYS forms if your smelter is in a proven business relationship with that exporter. This information can form part of your company records regarding <u>supplier's associated countries of activity</u> .
1C:3.4	Declaration of the countries or areas determined by the supplier to be a CAHRA	Not Applicable	It is a company responsibility to determine your list of CAHRA. ITSCI assumes all implementing areas are CAHRA and applies all steps of due diligence across all areas.
1C:3.5	Declaration of individuals and entities that hold direct or indirect beneficial ownership stakes in the supplier against relevant national and international sanctions lists and law.	<p>ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including any information on sanctions for ultimate beneficial owners, required up to 100% for in-region members (exporters) and expected up to 100% for international members.</p> <p>ITSCI KYS Forms: includes self-declared information on sanction list checks</p>	In addition to your company's own KYS checks on immediate suppliers and other known actors, you can obtain from ITSCI the exporter's self-declared KYS forms if your smelter is in a proven business relationship with that exporter. Other shareholder information on all ITSCI members is recorded in the membership list. This information can form part of your company records on <u>supplier declaration of sanctions</u> .
1C:4	For by-products from other metal ores, have a process to obtain and retain information to determine the point of separation of minerals from those other ores and all information required for red flag review from that point	Not Applicable	It is a company responsibility to assess and record if you receive any by-products. Note that ITSCI has tantalum, tin and tungsten in scope and mixed minerals of those 3T which may be considered as by-products fall within the same ITSCI systems and processes.

1C:5.1	Description of materials including composition, physical form and production date	Not Applicable	It is a company responsibility to record receipt of other types of materials. Part processed minerals from smelters such as slag are not in scope of ITSCI.
1C:5.2	Name and address of the immediate supplier	Not Applicable	It is a company responsibility to record name and address of immediate suppliers.
1C:5.3	Name and address of the supplying smelter that produced the material	Not Applicable	It is a company responsibility to record receipt of materials from supplying smelters. Output materials from smelters are not in scope of ITSCI.
1C:5.4	Transport documentation from the supplying smelter	Not Applicable	It is a company responsibility to record transport documents of minerals or materials from supplying smelters. Outputs from smelters are not in scope of ITSCI.
1C:5.5	Records of the independent third-party audit firm reports of the supplying smelter . Or, if the supplying smelter has not undergone an independent third-party assessment , the following additional information:	Not Applicable	It is a company responsibility to record third party audit reports on supplying smelters. Site audits at smelters are not in scope of ITSCI.
1C:5.5.1	Records identifying mineral or material inputs used for the production of materials received from the supplying smelter together with information required for red flag review in Step 2A, and further information for full due diligence on minerals if inputs are known or suspected to be from a CAHRA .	Not Applicable	This is a company responsibility. If the supplying smelter is also an ITSCI member the same information as outlined in this mapping document would be available to them for their due diligence. However, due diligence performance checks on smelters (step 4) are outside the scope of ITSCI. Outputs from smelters are not in scope of ITSCI.
1C:6.1	Description of the metal products including composition, physical form and production date	Not Applicable	It is a company responsibility to record receipt of other types of metal products. Outputs from smelters are not in scope of ITSCI.
1C:6.2	Name and address of the immediate supplier	Not Applicable	It is a company responsibility to record name and address of immediate suppliers.
1C:6.3	Name and address of the supplying smelters who produced the tin in the metal product	Not Applicable	It is a company responsibility to record receipt of metal products from supplying smelters. Output materials from smelters are not in scope of ITSCI.

1C:6.4	Transport documentation from the supplying smelter	Not Applicable	It is a company responsibility to record transport documents of metal products from supplying smelters. Outputs from smelters are not in scope of ITSCI.
1C:6.5	Records of the independent third-party audit firm reports of the supplying smelters . Or, if the supplying smelter has not undergone an independent third-party assessment , the following additional information:	Not Applicable	It is a company responsibility to record third party audit reports on supplying smelters. Site audits at smelters are not in scope of ITSCI.
1C:6.5.1	Records identifying mineral or material inputs used for the production of materials received from the smelter together with information required for red flag review in Step 2A, and further information for full due diligence on minerals if inputs are known or suspected to be from a CAHRA .	Not Applicable	This is a company responsibility. If the supplying smelter is also an ITSCI member the same information as outlined in this mapping document would be available to them for their due diligence. However, due diligence performance checks on smelters (step 4) are outside the scope of ITSCI. Outputs from smelters are not in scope of ITSCI.
1C:7.1	For legacy receipts, have sufficient documentation to describe the type of mineral or material and demonstrate that the conflict minerals were created in the current form and same chemical and physical state on a verifiable date prior to 1 February 2013.	Not Applicable	It is a company responsibility to record any claims on legacy conflict minerals
1C:7.2	For assay samples, have a description of the type of samples and sufficient documentation on the quantity of mineral received and a verification that this quantity is less than 0.03% of the total receipts from the same producer over the same period.	Not Applicable	It is company responsibility to record evidence of the lot number source of assay minerals and calculate percent threshold.
1C:7.2.1	For mineral assay samples received from CAHRAs the company may obtain a declaration from the producer and another party, such as government, aligned joint	Ad hoc request for ITSCI opinion	If any supplier requests to send assay samples to your smelter, you may <u>request that ITSCI provides an opinion</u> on whether quantities of such assay samples are plausible for that supplier (exporter) and to confirm that such samples were taken from minerals already traced via ITSCI Shipment Reports.

	initiative or the on-the-ground assessment team, that such quantities are plausible, and taken from mineral batches traceable by that party.		
1C:8.1	Description of the secondary material including composition, physical form and any other information such as analysis data and/or photos (refer to Annex B for example materials).	Not Applicable	It is a company responsibility to record receipt of secondary materials. Secondary (scrap or recycled materials) are not in scope of ITSCI.
1C:8.2	Name and address of the immediate supplier	Not Applicable	It is company responsibility to record names and addresses of secondary material suppliers. Secondary (scrap or recycled materials) are not in scope of ITSCI.
1C:8.3	Transport documentation from the immediate supplier	Not Applicable	It is company responsibility to record transport documents of secondary materials. Secondary (scrap or recycled materials) are not in scope of ITSCI.
1C:9	Have records of assessment of suppliers prior to entering into business with new suppliers, including assessment of risks[1].	<p>ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including improvement recommendations</p> <p>ITSCI Audits: provide an assessment of ITSCI exporters or international traders, including assessment of risks and their management, plus recommendations for improvement.</p>	Review the listed documents to <u>incorporate information and performance recommendations</u> into your company assessment of new suppliers.
1C:10	Calculate a mass balance as a means to substantiate the total material processed by the company, taking into account receipts, inventory, losses, and sales quantities. Any discrepancies observed during the mass balance calculation must be justified.	Not Applicable	It is company responsibility to calculate the mass balance for your facility
1C:a	Confirming that information on minerals, materials and suppliers has been submitted to, and evaluated by an aligned joint initiative	Documents listed in 1C:2.2 to 1C:2.5, 1C:3.2, 1C:3.3, 1C:3.5, 1C:3.7.2.1 (if applicable), and 1C:9 above.	See details explained in 1C:2.2 to 1C:2.5, 1C:3.2, 1C:3.3, 1C:3.5, 1C:3.7.2.1 (if applicable), and 1C:9 above
1C1-4:1.1	All taxes, fees or royalties paid to government for the purposes of	ITSCI 'C' Forms: completed by exporters, confirming the list of taxes paid to governments for each shipment.	As well as recording information from ITSCI audits of exporters, you can include in your contracts with your immediate suppliers'

	extraction, trade, transport and export of minerals ;	ITSCI Audits: for exporters, includes checks on payments to government	<u>requirements to provide you with ITSCI 'C' forms with every shipment.</u>
1C1-4:1.2	Any other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals ;	ITSCI incident summary tables: include records of incidents related to payments to government officials, including corruption	You can include in your contracts with your immediate suppliers' requirements to notify you of any payments to government officials in their supply chain <u>which have not already been recorded in ITSCI incidents.</u>
1C1-4:1.3	All taxes and any other payments made to public or private security forces or other armed groups at all points in the supply chain from the point of ore extraction onwards;	ITSCI incident summary tables: include records of incidents related to payments to public/private security forces or other non-state armed groups.	You can include in your contracts with your immediate suppliers' requirements to notify you of any payments to public/private security forces or other non-state armed groups in their supply chain <u>which have not already been recorded in ITSCI incidents.</u>
1C1-4:1.4	The ownership (including beneficial ownership) and corporate structure of the exporter, including the names of corporate officers and directors; the business, government, political or military affiliations of the company and officers;	ITSCI KYS Forms: provide information on beneficial ownership and structure of exporters.	You can include in your contracts with your immediate suppliers' requirements to disclose to you beneficial ownership and other relevant information <u>which has not already been disclosed to ITSCI</u>
1C1-4:1.5	The mine of mineral origin;	ITSCI shipment reports: include the list of all mines of origin associated with each shipment received by the smelter.	You can include in your contracts with your immediate suppliers requirements to <u>disclose mines of origin outside the scope of ITSCI</u> and which would not be included in ITSCI reporting
1C1-4:1.6	Quantity, dates and method of extraction (artisanal and small-scale or large-scale mining);	ITSCI shipment reports: include quantity of minerals associated with each shipment. ITSCI baseline reports: include information on the method of extraction.	You can include in your contracts with your immediate suppliers requirements to <u>disclose information on extraction outside the scope of ITSCI</u> and which would not be included in ITSCI reporting
1C1-4:1.7	Locations where minerals are consolidated, traded, processed or upgraded;	ITSCI shipment reports: include in-country locations where minerals are consolidated, processed and exported.	You can include in your contracts with your immediate suppliers requirements to <u>disclose information on mineral consolidation and processing locations outside the scope of ITSCI</u> and which would not be included in ITSCI reporting
1C1-4:1.8	The identification of all upstream intermediaries, consolidators or other actors in the upstream supply chain;	ITSCI shipment reports: include names of actors in the upstream mineral supply chain, inc. names of transporters. ITSCI baseline reports: include names of local cooperatives or mine companies and local traders (negotiants).	You can include in your contracts with your immediate suppliers requirements to <u>disclose information on all upstream actors (including cooperatives, negotiants and transporters) outside the scope of ITSCI</u> and which would not be included in ITSCI reporting

1C1-4:1.9	Transportation routes;	ITSCI baseline reports: include transport routes from mine to export.	You can include in your contracts with your immediate suppliers requirements to <u>disclose information on all transport routes that are in CAHRA but outside the scope of ITSCI</u> and which would not be included in ITSCI reporting
1C1-4:1.10	All export, import and re-export documentation of international concentrate traders and re-processors.	The scenario where minerals are, under local laws, exported from one country, processed, and re-exported was not common after 2011. There is no current scenario in scope of ITSCI but should it re-arise then it would be covered by ITSCI procedures and reported in the ITSCI Shipment Report .	You can include in your contracts with your immediate suppliers requirements to <u>disclose information on all export, import and re-export documentation of international concentrate trade and re-processing which is outside the scope of ITSCI</u> and which would not be included in ITSCI reporting.
1C1-4:2	Introduce a chain of custody or traceability system and retain information for five years	ITSCI systems of traceability and associated actions resulting in ' C' forms, shipment reports, baseline assessments and updates and incident summary tables provides the required information per 1C1 to 1C4: 1.1 to 1.3 and 1.5 to 1.10. ITSCI confirms this information is stored for 5 years.	You can record your understanding that <u>these traceability requirements are all covered by the scope of ITSCI for all minerals sourced as part of ITSCI</u> . You can also record what other minerals you source from CAHRA outside the scope of ITSCI whether in central Africa or elsewhere and record how you have implemented systems to meet those same requirements for those non-ITSCI minerals.
1C1-4:1.1	REFERS BACK TO 1C1-1C4		
1C1-4:3 (also covers 1.C.3.2)	Make the information gained related to company due diligence standards and processes available to immediate downstream purchasers or to auditors and any aligned joint initiative or institutionalised mechanism, regional or global, with the mandate to collect and process information on minerals from CAHRAs, with due regard taken of business confidentiality and other competitive or security concerns.	Mapping ITSCI information & ITA-RMI Tin Criteria expectations: ITSCI is an aligned joint initiative with a role to collect and process information on minerals supply chains from CAHRA and report those with due regard to business confidentiality, competitive and security concerns. Summarised and relevant information on context, risks, minerals and actors in scope of ITSCI is provided to relevant parties as explained in this mapping document. ITSCI Associate Membership: is available to downstream companies to access certain non-commercial ITSCI information.	By participating in ITSCI your company participates in an aligned joint initiative, which makes relevant information available to downstream companies. You can explain this to your purchasers and refer them to ITSCI.
1C1-4:4	Avoid, where practicable, cash purchases for company transactions. Where cash purchases are unavoidable, the company must obtain verifiable documentation and preferably route the transaction through official banking channels.	Not Applicable	It is a company responsibility to make efforts to avoid paying in cash and/or record cash purchases.

1C1-4:5	Support the implementation of the principles of the EITI individually or through joint efforts and through company participation in appropriate reporting. This reporting is required only in an implementing country of EITI.	<p>ITSCI Audits: checklist includes check on supporting the principles of EITI.</p> <p>ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including improvement recommendations regarding EITI.</p>	Confirm your supplier's commitments to support the EITI principles or confirm your suppliers' implementation of EITI as appropriate to your supplier's circumstances and locations.
1C1-4:a	Which minerals purchased are from sources/suppliers participating in an aligned joint initiative or institutionalised mechanism;	Documents listed in 1C1-4: 1.1 to 1.10 above	Confirm which of your minerals have been sourced from ITSCI suppliers and sources, are therefore <u>in the scope of ITSCI</u> and have been included in ITSCI monitoring and reporting per 1C1-4: 1.1 to 1.10 above . Your company does not need to establish additional systems for in scope suppliers and sources for covered time periods.
1C1-4:b	The status of the supplier's participation as reported by the aligned joint initiative or institutionalised mechanism at the time of the company transaction;	Documents listed in 1C1-4: 1.1 to 1.10 above	Confirm your <u>supplier's participation in ITSCI during the relevant time period</u> of your transactions and therefore in scope of ITSCI monitoring and reporting per 1C1-4: 1.1 to 1.10 above . Your company does not need to establish additional systems for in scope suppliers and sources for covered time periods.
1C1-4:c	The type of information held, and evaluated by, the aligned initiative/mechanism as a proxy for supply chain disclosure, including to downstream purchasers due to business confidentiality and other competitive or security concerns;	<p>Mapping ITSCI information & ITA-RMI Tin Criteria expectations: this document describes what information ITSCI holds and makes available.</p> <p>ITSCI Data and Information release document: describes what information is available to downstream purchasers</p>	ITSCI confirms information is <u>available to downstream</u> per 1C1-4:2 above
1C1-4:d	That information is held for five years.	See 1C1-4:2 above	ITSCI confirms our information is <u>kept for at least 5 years</u> per 1C1-4:2 above
1D:1	Establish, where practicable, long term relationships with suppliers	Not Applicable	It is a company responsibility to determine types of relationship with immediate suppliers
1D:2	Confirm that suppliers commit to a supply chain policy consistent with Annex II and the OECD Guidance	ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including to confirm a supply chain/conflict mineral policy has been submitted to ITSCI and whether it commits the company to OECD due diligence and managing Annex II risks as their company standards.	In case your supplier does not have a website, you can <u>confirm whether any ITSCI member company has a policy with relevant content</u> by reviewing the ITSCI membership list and associated recommendations for improvements. You can confirm with suppliers that they have <u>completed the recommended actions and shared evidence with ITSCI</u> for verification and update of their public summary.

1D:3	Communicate to suppliers their expectations on responsible supply chains of minerals from CAHRAs	Not Applicable	It is a company responsibility to communicate your sourcing standards and expectations to your suppliers
1D:4	Incorporate the company's supply chain policy and due diligence management processes into commercial contracts and/or written agreements with suppliers, including the right to conduct unannounced spot-checks on suppliers and have access to their documentation.	ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including to confirm whether their sample contract includes due diligence clauses, right to make spot checks, and access to documentation of suppliers.	Review your own company's membership pre-audit including <u>any recommendations made by ITSCI for improvement on your supplier engagement</u> ; including contractual agreements on your supply chain policy expectations and rights to spot check and access supplier information. If your supplier does not agree to provide you with access to commercial information check if such information is provided to ITSCI.
1D:5	Consider ways the company can support and build capabilities of suppliers to improve performance and conform to company supply chain policy, especially if carrying out Step 3 risk mitigation.	ITSCI monthly, quarterly, and annual reports: include overviews of training conducted by ITSCI on the ground, inc. for local exporters and mine companies. ITSCI Incident summary tables: include action taken by ITSCI to mitigate incidents, which can include training of local suppliers. ITSCI Audits: include checks on capacity-building of suppliers.	By confirming that your immediate suppliers are participating in ITSCI you will be helping to ensure those suppliers receive due diligence support and advice as well as more formal training (for exporters). You can <u>encourage suppliers to participate in training and/or request support from any ITSCI field</u> , incident reporting or secretariat teams.
1D:6	Design measurable improvement plans with suppliers, with the involvement, if relevant and where appropriate, of local and central governments, international organisations and civil society when pursuing Step 3 risk mitigation.	ITSCI Membership List: summarises information from the pre-audit of each ITSCI member company including recommendations to improve due diligence practices. ITSCI Audits: include recommendations for improvement. ITSCI Incident summary tables: include incidents regarding failures by ITSCI members to provide risk management DD plan. ITSCI incident summary tables: include column 'Action taken/ to be taken' on stakeholders included in discussion of risk mitigation plans and monitoring of results.	Review and incorporate any ITSCI recommendations for <u>improvements of due diligence practices of your suppliers</u> in improvement plans that you agree with them, including to address incidents that indicate failures of supplier due diligence. Review all ITSCI <u>incidents to identify which are relevant to your suppliers</u> and encourage their follow up and resolution as well as engagement of suppliers in risk mitigation.
1D:7	Monitor the performance of the immediate supplier against the expectations set out in the contract with the company.	Documents listed in 1D:6 above	Compare your requirements for due diligence as set out in your contracts with each supplier with any ITSCI recommendations or

			reported incidents on that supplier and <u>record progress of the suppliers performance improvement</u>
1D:a	Evaluates operators policies and due diligence plans and reports recommendations	See 1D:2 and 1D:6 above	See 1D:2 and 1D:6 above
1D:b	Holds and validates confidential or sensitive information	See 1D:4 as above	See 1D:4 as above
1D:c	Supports capacity building through training and general advice	See 1D:5 above	See 1D:5 above
1D:d	Has a process to regularly engage with stakeholders including governments and civil society	<p>ITSCI Monthly Reports: include information on engagement with local stakeholders via multi-stakeholder committees, including number of meetings held and participants.</p> <p>ITSCI Quarterly Summaries: include overview of all multi-stakeholder committees, number of meetings held and participants.</p>	ITSCI <u>confirms regular engagement with a wide range of stakeholders</u> in our implementation areas. This is evidenced by the listed documents which your company can review.
1D:e	Provides performance monitoring and improvement recommendations through regular reporting or audit.	See 1D:6 above	See 1D:6 above
1E:1	Have a mechanism allowing any interested party, including whistle-blowers, to voice concerns regarding the circumstances of extraction, trade and handling of minerals in or exported[1] from a CAHRA in order to alert the company to possible risks. The mechanism may be provided through collaborative arrangements with other companies, or by facilitating recourse to an external expert or body, such as an ombudsman.	<p>ITSCI whistleblowing mechanism: is available as publicised on our website here.</p> <p>ITSCI Monthly Reports: include reference to and information about ITSCI w/b mechanism</p>	In addition to any company whistleblowing mechanism that you provide, you can make use of and <u>promote the contact details of the ITSCI whistleblowing mechanism</u> . Issues submitted to ITSCI's whistleblowing system, once validated, are reported and managed as part of incident reporting. You can refer whistleblowing reports that you receive to ITSCI for follow up.
1E:2	Record concerns received through the company mechanism and the results of follow-up	ITSCI Incident Summary Tables: include incidents opened based on information received from whistleblowers.	Your company can review progress of actions on any whistleblowing reports that you have referred to ITSCI by <u>reviewing the relevant incident</u> information.

1E:a	Use of an industry-wide mechanism such as an aligned joint initiative which the company confirms is relevant to their own circumstances, and appropriately investigates reports, recommends, and monitors risk mitigation.	ITSCI Factsheet: Scope of the ITSCI Programme. The Factsheet provides information the type of initiative, the supply chain segments and OECD steps covered by ITSCI, the scope of membership, geographical scope, minerals in scope, risks in scope.	If relying only on the ITSCI whistleblowing mechanism record results of your evaluation that it is a <u>relevant and appropriate option for your company</u> .
OECD Step 2: Identify and assess risk in the supply chain			
2A:1	Have and implement a process to review information gathered in Step 1 (excluding Step 1.C1 to 1.C4) to determine whether further steps of due diligence are triggered	Not Applicable	It is a company responsibility to implement a process to review information gathered in step 1 to determine the extent of due diligence required - the red flag review
2A:2.1	Confirm that the type, weight, composition and quality of minerals and materials received are consistent with accompanying documentation	Not Applicable	It is a company responsibility to implement a process to check information is consistent with the mineral or materials received and identify and resolve any discrepancies.
2A:2.2	Confirm that information required for red flag review as set out in Step 1C has been collected and/or provided by the immediate suppliers and any known actors further upstream	See ITSCI documents listed in Step 1C above . Note that not all documents may be needed depending on the circumstances of your company and sourcing.	Your company will need to confirm whether all information required from immediate suppliers and other actors according to Step 1C has been provided. In some cases, information may have been obtained via ITSCI and you should check that you have <u>received all expected information</u> .
2A:2.3	Investigate and address any discrepancies or inconsistencies identified during the above review	No additional ITSCI documents.	In case you identify any <u>discrepancies in ITSCI information or between ITSCI and supplier information</u> you may contact ITSCI for further checks. This is in addition to your normal process to check discrepancies with your suppliers.
2A:3.1	Maintain a reasonable understanding of reserves, production and export statistics for all tin mining countries and/or regional mining areas within a country	ITSCI Monthly reports: provide production tonnage per province or country and mineral type, inc. production trends. ITSCI Quarterly Data Summaries: include aggregated production records per implementation area, disaggregated per country, territory/district/commune/province, and mineral type	You can <u>incorporate ITSCI production and export information listed into your plausibility process</u> to add to other sources of industry statistics and general industry knowledge which you will have. For red flag review, information required is at <u>country or regional (provincial) area level</u> , not at mine level. Note that ITSCI figures do not represent all production or export in any location.
2A:3.2	Investigate and address any higher than expected volumes of mineral supplied from any area	No additional ITSCI documents at country or regional (province) level. Other ITSCI documents are available to support enhanced due diligence in CAHRA which relate to	In case you identify <u>any higher than expected volumes of mineral</u> being supplied or offered from areas in ITSCI's scope, you may

	compared to the potential for production in that area	<p>plausibility but these are not required for general red flag review. Enhanced due diligence documents include;</p> <p>ITSCI Incident Summary Tables: include incidents regarding plausibility issues at more detailed level such as mine and territory.</p> <p>ITSCI Due Diligence List: highlights mine companies and associated mines with ongoing uncertainty about plausibility and which may therefore benefit from additional evaluation by companies to supplement ITSCI activities and actions.</p>	contact ITSCI for further checks. This is in addition to your normal process to check plausibility of your supplies.
2A:4.1	Record the types of information and resources used by the company to identify CAHRAs	ITSCI assessment reports of the security situation in areas in scope are a potential source of information referred to in Recommendation (EU) 2018/1149 on CAHRA.	If you use ITSCI information as a source <u>in your CAHRA determination</u> this should be recorded along with all other sources of information.
2A:4.2	Establish a method or procedure to make a CAHRA determination	Not Applicable	It is a company responsibility to have a procedure to make CAHRA determinations
2A:4.3	Establish the frequency at which the CAHRA determination is reviewed and updated	Not Applicable	It is a company responsibility to determine at what frequency you update your CAHRA determinations
2A:4.4	Include in the process a general evaluation of relevant national and international sanctions lists	Not Applicable	It is a company responsibility to include a process for general evaluation of sanctions as part of your CAHRA determination.
2A:5	Design and implement a process for red flag review in which the company compares the supplier and country of origin information gathered in Step 1C with the recorded results of the documentation check, the plausibility assessment, and the CAHRA determinations made by the company as above	Not Applicable	It is a company responsibility to implement your red flag review process using all available information, your document discrepancy and plausibility checks and your CAHRA determination.
2A:6	The responsible person must record the findings of the red flag review and report them to the senior management team.	Not Applicable	It is a company responsibility to ensure the findings of red flag review are reported to senior management for decision making
2A:7.1	Byproducts and their associated risks from the point of separation	ITSCI has tantalum, tin and tungsten in scope and mixed minerals of those 3T which could be considered as by-products all fall within the same ITSCI systems and processes.	While you will want to identify non-ITSCI by-products for which due diligence only begins at the point of separation, this is not relevant for ITSCI tracked minerals; ITSCI tracks all minerals back to the point of extraction at the mine, which is further

			upstream than any point of separation of any by-product. All by-product information requirements are therefore already in scope of ITSCI.
2A:7.2	Materials from supplying smelters, and evidence of third party assessment of that company and whether minerals treated by the supplying smelter are from CAHRAs, or otherwise information and actions equivalent to these full relevant criteria	Not Applicable	It is a company responsibility to assess supplying smelters. ITSCI does not audit smelters although other industry systems do and may provide support.
2A:7.3	Non-secondary metal products and evidence of third party assessment of the supplying smelter producing the tin and whether minerals treated by that company are from CAHRAs, or otherwise information and actions equivalent to these full relevant criteria	Not Applicable	It is a company responsibility to assess supplying smelters. ITSCI does not audit smelters although other industry systems do and may provide support.
2A:7.4	Legacy material verified to be out of scope	Not routinely supported by ITSCI but may provide ad hoc data confirmation if relevant.	See 1C:7.1
2A:7.5	Assay materials verified to be out of scope	Not routinely supported by ITSCI but may provide ad hoc data confirmation if relevant.	See 1C:7.2.1
2A:7.6	Secondary materials verified to be out of scope	Not Applicable	It is a company responsibility to determine secondary receipts
2A:8	In performing the red flag review the company must make a reasonable assessment of anomalies and likely risks and explain the findings which may conclude the outcome of the red flag review to be: [check full text]	Not Applicable	It is a company responsibility to implement your red flag review and determine if any red flags lead you to conclude that minerals are known or suspected to be from CAHRA. If you do determine this you should perform all 5 steps of due diligence, a.k.a. enhanced due diligence.
2A:a	Referring to information held, aggregated, or reported by an industry-wide mechanism such as an aligned joint initiative.	See relevant information listed throughout Step 2A section above	See relevant actions listed throughout Step 2A section above
2B:1	Understand the context of CAHRAs that have been identified in the company's supply chain.	ITSCI monthly reports: include information on local context, inc. security and political situation updates, inc. possible risks; production trends, including changes in economics or market dynamics on the ground, stakeholder engagement.	You can make use of information from the ITSCI sources listed to <u>understand the general context</u> of the mining and trading

		<p>ITSCI Stories from the Field: include information related to political, economic, social and security context, including by describing logistical, political, social, or economic challenges on the ground and potential improvements.</p> <p>ITSCI news or statements: include ad-hoc news or statements on particular security situations.</p> <p>ITSCI Annual Reports: include general updates about context by area.</p>	<p>areas that are in scope of ITSCI. This information can be used in addition to other sources that you have on ITSCI areas.</p>
2B:2	Clarify the information on chain of custody, activities and relationships of all upstream suppliers obtained for the red flag review in Step 1C.	<p>Chain of custody and relationships between suppliers is supported by;</p> <p>ITSCI shipment reports: provide information on chain of custody and suppliers.</p> <p>ITSCI physical tags received by smelters: demonstrate that minerals have been traced from the mine.</p>	<p>As you are making use of ITSCI and likely sourcing from CAHRA, you will already have access to significant amounts of information. All ITSCI documents are intended to support enhanced due diligence in CAHRA which are at a level of detail beyond that required for general red flag review. Relevant documents are discussed throughout this mapping guide.</p>
2B:3	Identify the locations and qualitative conditions of the extraction, trade, handling and export of the mineral by implementing Step 1 C1 to C4 (i.e., a chain of custody or traceability system).	<p>See information listed in 1C1-1C4: 1.1 to 1.10</p> <p>ITSCI Baseline reports: include location of all mines of origin associated with a shipment, type of exploitation, locations of mineral aggregation.</p> <p>ITSCI 'C' Forms: completed by exporters, confirming the list of taxes paid to governments for each shipment.</p>	<p>You are able to identify <u>locations and qualitative conditions</u> of the extraction, trade, handling and export of minerals in scope of ITSCI within the listed documents. Refer to 1C1-1C4: 1.1 to 1.10</p>
2B:4	Obtain and maintain up to date on-the-ground information for use in company risk assessment according	<p>See 2B:a to 2B:c below</p>	<p>ITSCI has on-the-ground teams in the field in all areas in scope. Field information provided by those teams is described throughout this mapping document. By participating in ITSCI, you support and <u>systematically receive up-to-date information from the ITSCI on-the-ground implementation teams.</u></p>
2B:a	Understanding of the scope, competence, methodology and standards of the on-the-ground teams of an aligned joint initiative used for the provision of	<p>ITSCI Factsheet: Scope of the ITSCI Programme. The Factsheet provides information on the type of initiative, the standard, the supply chain segments and OECD steps covered by ITSCI, the scope of membership, geographical scope, minerals in scope, risks in scope.</p>	<p>You can understand the <u>scope, competence, methodology and standards</u> of ITSCI by reference to descriptions in the listed documents.</p>

	information and recommendations for mitigation;	<p>ITSCI Programme Biographies and Skills Overview: provides an overview of skills of all ITSCI teams</p> <p>ITSCI Alignment Assessment report: includes information on methodology and scope of the ITSCI Programme.</p> <p>ITSCI Annual Incident Review: includes information on ITSCI incident matrix, methodology for incident reporting, outcomes of incident management.</p> <p>Mapping ITSCI information & ITA-RMI Tin Criteria expectations: this document describes what information ITSCI holds and makes available.</p>	
2B:b	Process for reviewing critical information generated by the on-the-ground teams of an aligned joint initiative; and	See information listed in 2B:1 to 2B:a above (including the referenced 1C1-1C4 section)	You should have appropriate processes to ensure you <u>review available ITSCI information</u> as well as any information you have from other sources. The amount of information should be sufficient to allow you to carry out your risk assessment (2C), and that there are no gaps in the information provided that would limit the performance of responsible persons in the company.
2B:c	Process for implementing company actions to obtain information identified to be outside the scope or implementing activities of the aligned joint initiative	See IV:f above	See IV:f above
2C:1.1	The principles and standards of the company supply chain policy referencing Annex II	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain
2C:1.2.1	National laws of the countries; where the company is domiciled or publicly-traded (if applicable);	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain
2C:1.2.2	from which the minerals originate; and	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain

2C:1.2.3	of transport or re-export	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain
2C:1.3	Legal instruments governing company operations and business relations, such as financing agreements, contractor agreements and supplier agreements	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain
2C:1.4	Other relevant international instruments such as the OECD Guidelines for Multinational Enterprises, international human rights and humanitarian law	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain
2C:2	Record the outcome of the risk assessment, including any identified risks to the company supply chain	Not Applicable	It is a company responsibility to use available information in your process of risk assessment, the outcome of which should identify risks to your supply chain

OECD Step 3: Design and implement a strategy to respond to identified risks

3A:1	Have and implement a process to ensure that on an ongoing basis, an outline of information gathered and the actual and potential risks identified in the supply chain risk assessment are reported to senior management with designated responsibility for company due diligence and decision making. Records of how senior management have incorporated risks and assessments into company decisions must be maintained.	Mapping ITSCI information & ITA-RMI Tin Criteria expectations: this document describes what information ITSCI holds and makes available, including on actual and potential risks identified in supply chains.	The results of your risk assessment should be reported to senior management to inform their decision making. You also have access to a significant amount of up-to-date information on actual risks on an on-going basis via the ITSCI incident tables. You may wish to choose to spot check ITSCI recommendations and plans on lower level 2 and 3 risks, while ensuring all <u>high level 1 risks are reported to senior management. In all cases, you should keep records of how senior management have incorporated risks and assessments into company decisions.</u>
3B:1	Maintain a risk management plan explaining possible company strategies in response to risks which include: continuing trade throughout the course of measurable risk mitigation efforts; temporarily suspending trade while pursuing ongoing measurable mitigation efforts;	ITSCI confirms that we adopt the OECD Annex II approach to risks. In recommending potential responses to risk to companies, government and stakeholders we apply a strategy as laid out in Annex II which may be; 1. continue implementation while mitigating risks, or 2. temporarily suspending implementation while mitigating risks, or 3. disengage from risks that cannot be mitigated or after failed mitigation attempts.	Compare the ITSCI strategy for recommending actions to respond to actual risk events (incidents) with your own company strategy. Record <u>whether ITSCI and company strategies for continued trade, suspension or disengagement are aligned.</u> In case you have a different strategy to respond to risks you should inform all suppliers and stakeholders.

	Disengaging with a supplier in cases where mitigation appears not feasible or unacceptable	<p>ITSCI Annual Incident Review: includes information on ITSCI incident matrix, methodology for incident reporting, outcomes of incident management.</p> <p>ITSCI Alignment Assessment report: includes information about/evaluation of ITSCI incident management mechanism.</p>	
3B:2	Review identified risks against the company policy to determine the relevant risk management strategy and a relevant risk management plan.	<p>ITSCI incident summary tables: provide information on recommended mitigation actions and progress of actions' implementation.</p> <p>ITSCI alerts: are provided to inform companies of high Level 1 incidents that may require their urgent attention</p>	You should review ITSCI incidents which are relevant to your supply chain to <u>evaluate if you agree with the ITSCI recommended risk management actions</u> or if you also wish to take alternative or additional actions. If you have confirmed that your company standards and strategy to respond to risks is aligned with OECD Annex II, which is also the strategy adopted by ITSCI, risk management plans are likely to be appropriate for you.
3B:3	When mitigating risks, include in the risk management plan a description of means to achieve progressive improvement within reasonable timescales as set out in the company policy and standards in Step 1A:3.	<p>ITSCI incident summary tables: provide information on recommended mitigation actions and progress of actions' implementation within 6 months, and outcome (whether the incident is resolved or unresolved).</p> <p>ITSCI Alerts: are provided to inform companies of high Level 1 incidents that may require their urgent attention.</p>	You should review ITSCI incidents which are relevant to your supply chain to <u>evaluate if you agree with the ITSCI reported resolution of incidents</u> , or if you also wish to take alternative or additional actions. If you have confirmed that your company policy on achieving progress on risks is aligned with OECD Annex II, which also sets the timescale adopted by ITSCI, the timescales are likely to be appropriate for you.
3B:4	In order to support progressive improvement, build and/or exercise leverage over the actors in the supply chain who can most effectively and most directly mitigate the risks.	ITSCI incident summary tables: provide information on recommended mitigation actions and progress of actions' implementation within 6 months, and outcome (whether the incident is resolved or unresolved).	You should review ITSCI incidents which are relevant to your supply chain to evaluate how your company can apply <u>leverage on suppliers or other actors</u> to achieve a timely resolution.
3B:5	Consult with suppliers and affected stakeholders to agree on the strategy for risk mitigation in the risk management plan including qualitative or quantitative measures of improvement.	<p>ITSCI monthly, quarterly, and annual reports: provide information on multi-stakeholder committees, inc. number of meetings held, locations, number of participants.</p> <p>ITSCI incident summary tables: include updates on discussions held at multi-stakeholder committee meetings, inc. agreed actions and outcomes.</p>	ITSCI <u>engages multiple stakeholders</u> in discussion of identified incidents and encouraging relevant actors to take actions. This engagement can be reviewed in the listed documents. You should evaluate if any additional stakeholders should be consulted and take action if you consider this necessary.
3B:6	Publish the supply chain risk assessment and risk management plan with due	ITSCI monthly reports: provide information on multi-stakeholder committees, inc. number of meetings held, locations, number of participants.	ITSCI publicly <u>communicates incidents in the local area</u> to engage relevant stakeholders in risk management. This includes through local multi-stakeholder meetings. This engagement can

	regard to business confidentiality and other competitive concerns (refer to Step 5).	ITSCI incident summary tables: both types of reports are publicly available to participating companies and other partner stakeholders before being made accessible online	be reviewed in the listed documents. You can also review risk management plans in monthly ITSCI incident tables published to participating companies and governments.
3B:7	Include in the risk management strategy and plan, responses to risks associated with national and international sanctions, including notification of those risks in the annual due diligence report and to customers	Not Applicable	It is a company responsibility to report sanctions related risks in annual public reporting and customers.
3B:a	Risk mitigation measures recommended are appropriate for the company plan;	See 3B:2 and 3B:3 above	See 3B:2 and 3B:3 above
3B:b	There is direct engagement with affected stakeholders to pursue mitigation;	See 3B:4 to 3B:6 above	See 3B:4 to 3B:6 above
3B:c	Progress is reviewed on-the-ground against the recommended actions;	See 3B:3 above	See 3B:3 above
3B:d	Information on risks and progress of mitigation is shared while taking into account due regard to business confidentiality and other competitive concerns	<p>ITSCI Information and Data Release policy: sets out what information is shared with which stakeholders</p> <p>ITSCI Membership agreement: defines the approach to company confidentiality</p> <p>Mapping ITSCI information & ITA-RMI Tin Criteria expectations: this document describes what information ITSCI holds and makes available, including on risks and progress of mitigation.</p>	You can review how information is shared and the <u>approach to confidentiality</u> in the listed documents.
3B:e	Whether additional responses or actions by the company are needed, including disengagement, suspension	See 3B:1 to 3B:6 above	See 3B:1 to 3B:6 above
3C:1	Have and implement the risk management plan	ITSCI incident summary tables: circulated as part of the monthly report to provide up-to-date information.	You can evaluate the <u>extent to which the risk management (incident) actions have been implemented</u> by reviewing the monthly updates. You can take alternative or additional actions as you consider necessary.

3C:2	Monitor and track performance of risk mitigation in cooperation and/or consultation with local and central authorities, upstream companies, international or civil society organisations and affected third parties.	ITSCI incident summary tables: circulated as part of the monthly report to provide up-to-date information.	You can evaluate the <u>extent to which stakeholders have engaged</u> and acted on risk management (incident) actions by reviewing the monthly updates. You can take alternative or additional actions as you consider necessary.
3C:3	Report back to designated senior management and consider suspending or discontinuing engagement with a supplier after failed attempts at mitigation.	ITSCI incident summary tables: circulated as part of the monthly report to provide up-to-date information, showing status of resolution after 6 months.	You can evaluate the <u>report to senior management on the progress</u> of risk management (incident) actions by reviewing the monthly updates. You can take alternative or additional actions as you consider necessary.
3C:4	Consider establishing or supporting a community monitoring network.	<p>ITSCI monthly and quarterly reports: show information on multi-stakeholder committees, inc. locations and no. of meetings held.</p> <p>ITSCI whistleblowing mechanism: reported in monthly and quarterly reports, and w/b policy on ITSCI website.</p> <p>See also 1E above on whistleblowing mechanism</p>	By participating in ITSCI <u>you are supporting community monitoring</u> via the ITSCI whistleblowing mechanism as well and via the local stakeholder meetings and engagements. You can take alternative or additional actions as you consider necessary.
3C:5	Implement the risk management strategy and plan for risks associated with relevant national and international sanctions.		It is a company responsibility to plan their own risk management strategy and plan in response to sanctions risk
3C:a	Direct engagement with affected stakeholders to pursue mitigation has continued	See 3C:2 above	See 3C:2 above
3C:b	Whether a community monitoring network is in place (if established)	See 3C:4 above	See 3C:4 above
3C:c	The results of mitigation six months from the identification of any risk	See 3C:3 above	See 3C:3 above
3C:d	Whether additional responses or actions by the company are needed, including disengagement, suspension or to increase leverage on suppliers or other stakeholders	See 3C:1 to 3C:4 above	See 3C:1 to 3C:4 above
3D.1	Conduct on-going monitoring, and after the implementation of the risk management plan and/or following any change in the	ITSCI incident summary tables: circulated as part of the monthly report to provide up-to-date information, showing status of resolution after 6 months	ITSCI provides continual monitoring on the ground. You can evaluate and report to senior management to <u>evaluate any need</u>

	company supply chain information gathering, and cross-checking against company standards must be repeated (Step 2B-2C).		to change company approach to any risk. You can take alternative or additional actions as you consider necessary.
3D:a	Refer to the on-going risk monitoring of the aligned joint initiative to assist with their review	See all ITSCI information relevant to step 3 above	ITSCI provides continual monitoring on the ground. You can evaluate and report to senior management to <u>evaluate any need to change company approach to any risk</u> . You can take alternative or additional actions as you consider necessary.
OECD Step 4: Carry out independent third-party audit of supply chain due diligence			
4A:1	Is carried out to required audit principles, by competent auditors who may be monitored through performance indicators.	Not Applicable	ITSCI does not perform site audits at smelters
4A:2	Is adequately prepared with samples of relevant documentation available to be reviewed in preparation or performance of the audit.	Not Applicable	ITSCI does not perform site audits at smelters
4A:3	Includes, when sourcing from known or suspected CAHRA's, on-site investigations of suppliers to the smelter, as well as meetings with the on-the-ground assessment team and consultations with local authorities, civil society and experts.	No additional ITSCI documents.	<p>In situations where smelters in ITSCI implementation areas (CAHRA) directly employ auditors to evaluate their due diligence, ITSCI field teams can be available for interview.</p> <p>ITSCI smelter members may wish to submit a request for ITSCI to perform an ad-hoc formal site audit at any immediate supplier or exporter, if the smelter has a need for updated assessment of supplier's or exporter's performance. In such situations the supplier may be requested to cover the cost of the site audit.</p> <p>According to the OECD, upstream joint initiatives are not expected to carry out audits and this is a supplementary action by ITSCI.</p>
4A:4	Undergo an audit of all activities, processes and systems used by the smelter to conduct supply chain due diligence, regardless of their sourcing practices, type of materials, or origin of minerals	Not Applicable	ITSCI does not perform site audits at smelters
4B:1	Allow auditors access to company sites, personnel and all documentation and records of	Not Applicable	ITSCI does not perform site audits at smelters

	supply chain due diligence relevant to the scope of the audit.		
4B:2	When sourcing from known or suspected CAHRA's, facilitate auditor contact with a sample of immediate suppliers.	ITSCI Audit reports: results of ITSCI audits at a sample of major traders and exporters including any audits carried out upon ad-hoc requests (4A:3).	Auditors at smelters should make use of ITSCI information on your suppliers as part of their assessment procedure; in particular, the auditor at the smelter must rely on existing ITSCI audits on the sample of your suppliers.
4B:a	Allowing auditors access to independent audit reports from an aligned joint initiative on a sample of company suppliers.	See 4B:2 above	See 4B:2 above
OECD Step 5: Report on supply chain due diligence			
5A1:1.1	Describe the company's supply chain policy	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:1.2	Explain the management structure responsible for due diligence	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:1.3	Describe the system used by the company to gather information necessary for red-flag review	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:1.4	Explain how information obtained for red flag review has strengthened the company's due diligence efforts	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:1.5	Describe the company's record-keeping system	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:1.6	Describe methods for disclosing relevant information to downstream actors or to auditors, an aligned joint initiative or institutionalised mechanism	Not Applicable	It is a company responsibility to produce an annual Step 5 report with appropriate and accurate content
5A1:2.1	Describe the company's system for chain of custody and traceability of the supply chain to identify locations and operators for Annex II risk assessment.	<p>Description of how the ITSCI Programme establishes chain of custody and traceability (1C1 to 1C4:2) starting at mine level and which identifies locations and suppliers for risk assessment (2C):</p> <p>ITSCI trains government agents to implement the in-region tagging and record collection system to ensure traceability from the mine sites to processors and exporters, via monitored transport routes. The government generated data is</p>	You can include a statement confirming your use of ITSCI's chain of custody system in your public report, confirming that it identifies locations and operators to the mine of origin. You can also include reference to the ITSCI website and ITSCI public report (e.g. 2024 Annual Report) and our brief public description of how the ITSCI chain of custody system operates, including that it generates information per 1C1-1C4:2

		<p>consolidated and verified at the ITSCI data centre, where any anomalies that may indicate risk are identified as incidents for follow up by ITSCI field teams. ITSCI traceability & chain of custody also includes the identification of all actors along the supply chain, including miners, local traders or negociants, transporters, processors, exporters.</p> <p>ITSCI follows the transport of minerals in the international market through traders to smelters and information on this part of the supply chain is also provided to, and checked by, the ITSCI data centre. Tags are physically delivered to the smelter and reported back to ITSCI for verification of mineral source and associated mine information. Each container of mineral may contain >1,000 tags from multiple mines. ITSCI provides a mechanism for supply chain information exchange which protects commercially confidential and security sensitive data, while providing transparency on risks and other information necessary for companies to monitor, improve and have confidence in their global supply chains.</p> <p>A description of how ITSCI operates, works with stakeholders, establishes traceability, identifies mines and risks, support risk mitigation, and generates information for use by ITSCI members is described in a published ITSCI Booklet (https://www.itsci.org/wp-content/uploads/2017/01/iTSCi-Booklet-2016-.pdf).</p> <p>The ITSCI incident management system, including how incidents are recorded, categorised, and monitored is described on the ITSCI website (https://www.itsci.org/incident-summaries-public/).</p>	
5A1:2.2	Describe methods for disclosing relevant information to mine of origin to downstream actors or to auditors, an aligned joint initiative or institutionalised mechanism.	<p>New mines are added to the ITSCI Programme on a regular basis as miners discover new sources and locals highlight the need to ITSCI field teams, or upon request from existing mining operators. Almost all mines are worked with basic tools by artisanal or small scale mining methods and provide employment for miners, washers, transporters, processors, and many other associated service workers.</p>	<p>Assuming that your smelter undergoes Step 4 due diligence assurance, all your supply chain information including mine of origin will have been disclosed to your appointed auditor. You can describe in your public report your process for recording up to the mine of origin, including how that information is held and validated by ITSCI as a joint initiative. In addition, that information is validated for the benefit of downstream through</p>

		<p>See also 5A:2.2 above: Description of ITSCI chain of custody (1C1 to 1C4:2) that identifies locations and suppliers for risk assessment (2C)</p> <p>ITSCI Associate Membership: is available to downstream companies to access certain non-commercial ITSCI information.</p>	the assurance engagement as a proxy for other forms of disclosure.
5A1:2.3	Describe how the company publicly supports the principles of the EITI individually or through joint efforts and through company participation in appropriate reporting. This is required in an implementing country.	Not applicable	It is a company responsibility to support and implement EITI
5A1:3.1	Publish the methodology and results of the risk assessment and the supply chain management plan with due regard taken of business confidentiality and other competitive concerns (Refer to Step 3B).	<p>Description of how ITSCI information on local context (2B:1), and on-the-ground risk (2B:4) is generated and which can be combined with chain of custody for risk assessment (2C) by the company.</p> <p>Description of ITSCI incident system and approach, including how stakeholders are engaged in risk management plans.</p> <p>ITSCI field teams help to collect local information on risks in the mineral supply chain, to discuss with all stakeholders, and provide local input into the risk mitigation or resolution process. The ITSCI Programme supports the set-up and training of multi-stakeholder committees chaired by the government and including civil society and industry members.</p> <p>ITSCI records, summaries, verifies and reports on progress of many types of risks throughout incident management system. These incidents give an accurate picture of the effectiveness of continual monitoring on the ground in resolving risks. Risks might be reported from information gathered from multiple plausible sources including field agents, whistle-blowers, local NGO's and UN reports.</p> <p>Once a plausible risk has been identified, stakeholders that are implicated are contacted by ITSCI for their input and reaction.</p>	Per 3B, you should describe how your company uses information from the ground to carry out risk assessment and provide an overall summary of risks you identify. You can also refer to public ITSCI incident tables on every identified risk event, with associated risk management actions and information on stakeholder engagement carried out by ITSCI as part of risk management.

		<p>Following receipt of additional information and clarification over a period of time, the ITSCI reporting team summarise events according to all available information, suggest actions for different parties to resolve risks, and follow up to report on whether those actions have been successfully completed.</p> <p>Incidents are allocated one of three levels of seriousness, where 3 is ranked the lowest, and 1 the highest level. Priority issues requiring immediate and high-level attention and possible disengagement in the supply chain according to OECD Annex II are classified as Level 1. Low level incidents relating to mistakes or lack of capacity or training are considered Level 3, with intermediate or repeated issues as a mid-category of Level 2.</p> <p>Incidents may remain open for up to six months while the ITSCI team and/or involved stakeholders are verifying information, monitoring the situation and/or implementing mitigation actions. Information on incidents is then made public after information is verified and all incidents in the 6 monthly reporting period are closed. Incidents may be closed in three ways;</p> <ul style="list-style-type: none"> • Resolved – The ITSCI team and/or involved stakeholders have agreed and implemented actions which have resulted in satisfactory mitigation. • Unresolved – The involved stakeholders may not have agreed, or commonly have not effectively implemented all recommended mitigation actions. • Inconclusive – The ITSCI team do not find sufficient evidence to support an allegation or need for mitigation. <p>Summaries of incidents, on-going developments, actions or challenges are provided every month to members prior to wider publication on the ITSCI website.</p>	
5A1:3.2	Outline the methodology, practices and information yielded by the on-the-ground assessment.	The 'Mapping ITSCI information & ITA-RMI Tin Criteria expectations' document (this document) describes where to find information on ITSCI methodology and practices	You can include a statement confirming your use of ITSCI as your on-the-ground team in your public report. You can also refer to the ITSCI website and this document to outline what information ITSCI provides from the ground on an on-going

		(alignment with OECD), and information generated by ITSCI and available to smelters.	basis. You should also describe how your company reviews information that ITSCI provides from the ground.
5A1:3.3	Explain the methodology of company supply chain risk assessments.	Not Applicable	It is a company responsibility to determine a method and carry out an overall risk assessment
5A1:4.1	Describe the steps taken to manage risks, including a summary report on the strategy for risk mitigation in the risk management plan, and capability training, if any, and the involvement of affected stakeholders.	<p>ITSCI field teams continuously monitor and evaluate risks, engage local stakeholders and report on mitigation. ITSCI provide expert field teams who made an average of 800 monthly visits to mine sites, companies, processors, and exporters to provide credible risk information, provide guidance and build the capacities of supply chain companies, cooperatives, miners and other stakeholders. ITSCI's experienced teams provide support and recommendations to stakeholders for actions appropriate for OECD aligned mitigation, and ITSCI facilitates provincial and local multi-stakeholder committees to transparently discuss mitigation plans. ITSCI field teams conduct regular training sessions on a wide range of issues including traceability procedures, overall due diligence principles, risk assessment and mitigation. ITSCI supplements on-the-ground activity with analysis of mitigation actions and outcomes of incidents monitored and closed over a 12-month period to understand the mitigation impact of the programme.</p> <p>ITSCI adopts the OECD Annex II approach to risks. In recommending potential responses to risk to companies, government and stakeholders, ITSCI applies a strategy as laid out in Annex II which may be;</p> <ol style="list-style-type: none"> 1. continue implementation while mitigating risks, or 2. temporarily suspending implementation while mitigating risks, or 3. disengage from risks that cannot be mitigated or after failed mitigation attempts. <p>Description of ITSCI incident system and approach, including how stakeholders are engaged in risk management plans: see 5A1:3.1</p>	You can include a statement confirming your use of ITSCI as your on-the-ground team in your public report, including to support risk management. You can also refer to the ITSCI website and incident tables to show risk management planning and actions, as well as descriptions of capability training. You should also describe how your company reviews information that ITSCI provides from the ground.

5A1:4.2	Disclose the efforts made by the company to monitor and track performance	<p>ITSCI records, summaries, verifies and reports on progress of many types of risks throughout incident management system. These incidents give an accurate picture of the effectiveness of continual monitoring on the ground in resolving risks. Risks might be reported from information gathered from multiple plausible sources including field agents, whistle-blowers, local NGO's and UN reports.</p> <p>Once a plausible risk has been identified, stakeholders that are implicated are contacted by ITSCI for their input and reaction. Following receipt of additional information and clarification over a period of time, the ITSCI reporting team summarise events according to all available information, suggest actions for different parties to resolve risks, and follow up to report on whether those actions have been successfully completed.</p> <p>Incidents are allocated one of three levels of seriousness, where 3 is ranked the lowest, and 1 the highest level. Priority issues requiring immediate and high-level attention and possible disengagement in the supply chain according to OECD Annex II are classified as Level 1. Low level incidents relating to mistakes or lack of capacity or training are considered Level 3, with intermediate or repeated issues as a mid-category of Level 2.</p> <p>Incidents may remain open for up to six months while the ITSCI team and/or involved stakeholders are verifying information, monitoring the situation and/or implementing mitigation actions. Information on incidents is then made public after information is verified and all incidents in the 6 monthly reporting period are closed. Incidents may be closed in three ways;</p> <ul style="list-style-type: none"> • Resolved – The ITSCI team and/or involved stakeholders have agreed and implemented actions which have resulted in satisfactory mitigation. • Unresolved – The involved stakeholders may not have agreed, or commonly have not effectively implemented all recommended mitigation actions. • Inconclusive – The ITSCI team do not find sufficient evidence 	<p>You can include a statement confirming your use of ITSCI as your on-the-ground team in your public report, including to monitor progress of risk management. You can also refer to the ITSCI website and incident tables to show risk management results. You should also describe how your company reviews information that ITSCI provides from the ground.</p>
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5A1:5	Publish its annual due diligence report regardless of their sourcing practices, type of materials, or origin of minerals.	The 'Mapping ITSCI information & ITA-RMI Tin Criteria expectations' document (this document): ITSCI Guidance on how to write an annual due diligence report shared every year with ITSCI members, with incidents opened if annual reports are not submitted to ITSCI.	The ITSCI website is available for you to publish your annual Step 5 reports, especially if you do not have your own company website.
5A1:6	Include information on their approach to, and conclusions from, their red flag review.	Not Applicable	It is a company responsibility to produce a company supply chain/conflict mineral policy.
5A1:a	Referring in its annual due diligence report, in general terms, to methodologies, information, results or strategies expected to be published by an aligned joint initiative or institutionalised mechanism while not identifying relations with specific suppliers or customers.	See section 5A1:2.1 to 5A1:5 above	As a joint initiative ITSCI can effectively and efficiently implement activities to support and provide information for company due diligence. While your company remains responsible for ensuring ITSCI is appropriate to your needs it is not necessary for you to describe activities carried out by ITSCI in depth if you can instead <u>refer to methodologies, information, results or strategies already published by ITSCI</u> . You more simply need to report on how you review information you receives, determine whether you are in agreement with the steps taken, or if you have determined that you must undertake additional work appropriate for your own circumstances and decisions. Your report should explicitly identify the location where information on and about ITSCI is public such as on our website.
5A2:1	Audit firm summary report with due regard taken of business confidentiality and other competitive concerns including price information and supplier relationships	Not Applicable	ITSCI does not perform site audits at smelters

5A2:2	The name of the audit firm (this information may be included in the audit firm summary report)	Not Applicable	ITSCI does not perform site audits at smelters
5A2:3	Supply Chain Policy	Not Applicable	It is a company responsibility to publish their supply chain policy
5A2:a	Publishing their audit firm summary report via an industry-wide mechanism such as an aligned joint initiative.	Not Applicable	ITSCI does not perform site audits at smelters nor publish audit reports of smelters

Final note

If ITSCI member smelters do not receive regular communication and information from ITSCI, we advise you to contact us to confirm or update the company's contact details. ITSCI sends quarterly reminders to companies to confirm a company's information is up to date. ITSCI also sends monthly reminders to smelters regarding requests for shipment reports. Smelters should review information from ITSCI, whether received through member communication or on our website, to enable you to (where possible) actively participate in risk mitigation, including by following up with your own suppliers.

Contact details

For further information, please contact the ITSCI Secretariat, itsci@internationaltin.org.