



Public Due Diligence Report for Responsible Minerals Sourcing

**1. Company Information**

Tin Technology & Refining was established in 2013 as the reclaim division of Nathan Trotter & Co. While Nathan Trotter remains a majority partner, Tin Tech operates as an independent company. Tin Tech only processes and recycles secondary metals and does not process concentrates in any form. Tin Tech operates from a single plant located in West Chester, PA.

**2. RMAP Assessment Summary**

Tin Tech was accepted into the Risk Based Assessment Program following an initial assessment on August 29<sup>th</sup> 2018 and a subsequent audit in August of 2019. The were conducted by SCS Global Services and Arch Advisors respectively, both of which were appointed as auditors by RMI. As part the condition of acceptance into this program, Tin Tech will provide RMI with yearly updates on the company Supply Chain Policy and any changes to all sourcing practices within the company. The next on-site audit is scheduled for August 2022.

**3. Company Supply Chain Policy**

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, Tin Tech has developed a supply chain policy. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on the company website at [www.tintech.com](http://www.tintech.com).

**4. Company Management Systems**

*Management Structure*

Tin Tech follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- The General Manager will have the responsibility to manage the due diligence program and risk management design and implementation. As the due diligence program manager, responsibilities include coordination of various functions including purchasing, receiving, and quality, respective training of personnel within these functions, and maintenance of the due diligence program.
- Tin Tech conducts due diligence training as required for the job function, and issues regular communications to employees with any changes to the program. Training records are documented and retained.

*Internal Systems of Control*

Tin Tech updated its due diligence management system to be aligned with the OECD Guidance and RMAP in June of 2019. The company communicated the updated supply chain policy and sourcing requirements to all relevant upstream suppliers in July of 2019. The company has incorporated due diligence requirements into legally binding agreements with direct suppliers when applicable. Tin Tech visits 100% of its primary tin suppliers, and over 10% of its secondary material suppliers annually. Tin Tech utilizes its formalized grievance mechanism to control grievances from interested parties.

### *Record Keeping System*

Tin Tech requires that all records relating to the due diligence program are maintained for at least 5 years. Records are stored digitally and/or hard copy.

## **5. Risk Identification**

Tin Tech has a robust process to identify risks in the supply chain.

To address those risks referenced in Tin Tech's supply chain policy, a procedure to identify CAHRA (Conflict Affected and High-Risk Areas) has been developed. The procedure includes:

- The criteria used to define a CAHRA
- The resources used to identify a CAHRA, namely:
  - Heidelberg Conflict Barometer
  - Fragile State Index
  - Worldwide Governance Indicators
  - Industry groups including RMI, ITRI, ATTA.
- The annual frequency with which the determination is reviewed.

Tin Tech also follows a Know your Counterparty (KYC) process which includes supplier location mapping, financial, identification, and industry. The Due Diligence Manager reviews this information annually with the purchasing team and General Manager. Whenever red flags are identified, the Due Diligence Manager, purchasing team, and general manager will engage the supplier as required. During this reporting period, there were no red flags reported.

At the transaction level, because Tin Tech only processes secondary materials, generating process is determined for each material type, as well as originating country.

All information collected is reviewed by the Due Diligence Manager against CAHRA's, sanction lists, local laws, and internal sourcing requirements.

## **6. Supply Chain Review**

Tin Technology's Supply Chain was reviewed against the criteria outlined in the risk assessment factors and all sources were determined to be low risk.