

How to Complete a Conflict Minerals Reporting Template (CMRT)

CMRT Rev. 6.31

June 2023

Japan Electronics and Information
Technology Industries Association (JEITA)
- Responsible Minerals Trade Working Group -

【Notice】

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1. Conflict Minerals Survey

1. Conflict Minerals Survey: Background

What is the Conflict Minerals Survey?

This survey is a way to respond to the requirement since May 2013 under the US Dodd-Frank Wall Street Reform and Consumer Protection Act (**Dodd-Frank Act: DFA**) that the US-listed companies investigate and disclose annually whether the **conflict minerals** ^{#1} used in their products are a **source of funds for armed groups** in the **covered countries** ^{#2}.

^{#1} Conflict minerals (**3TG**) (regardless of place of origin): **Tantalum, Tin, Tungsten, Gold**

^{#2} The Democratic Republic of Congo (**DRC**) and the nine adjoining countries³

The survey is also used to comply with the **EU Conflict Minerals Regulation** that, as of January 2021, companies importing **conflict minerals** into the EU as **ores and raw metals** investigate and report annually whether these are related to the **Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance Annex II Risks**^{#3} in regions defined as **Conflict-Affected Areas and High-Risk Areas (CAHRAs)**. ^{#4}

^{#3, #4} details on following pages

1. Conflict Minerals Survey: OECD Annex II Risks

OECD Annex II Risks:

Those risks defined in Annex II of the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas** #1

- OECD Annex II Risk:**
1. Serious **abuses** associated with the extraction, transport or trade of minerals (child labor, etc.)
 2. Direct or indirect support to **non-state armed groups**
 3. **Illegal acts** by public or private security forces (protection money)
 4. **Bribery** and fraudulent representation of the origin of minerals
 5. **Money laundering**
 6. Payment of taxes, fees and royalties due to governments (**tax evasion**)

#1 Available for download from MOFA website (version 3, provisional translation)

<https://www.mofa.go.jp/mofaj/gaiko/csr/housin.html>

Please be aware that, on OECD website, the English (official) edition is updated to the current version 3, but the Japanese translation is still of version 1 (as of **May 10, 2023**)

1. Conflict Minerals Survey: Definition of CAHRAs in OECD

Definition of **Conflict-Affected and High-Risk Areas (CAHRAs #1)** in **OECD**:

Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people.

Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc.

High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

#1 CAHRAs: **Conflict-Affected** and **High-Risk** Areas

1. Conflict Minerals Survey: CAHRAs in the EU Regulation

EU definition of CAHRAs are countries/areas that are

- (1) in a state of armed conflict, fragile post-conflict areas; or
- (2) witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses

The 1st version of the CAHRAs list was released on Dec.17. 2020

<https://www.cahraslist.net/cahras>

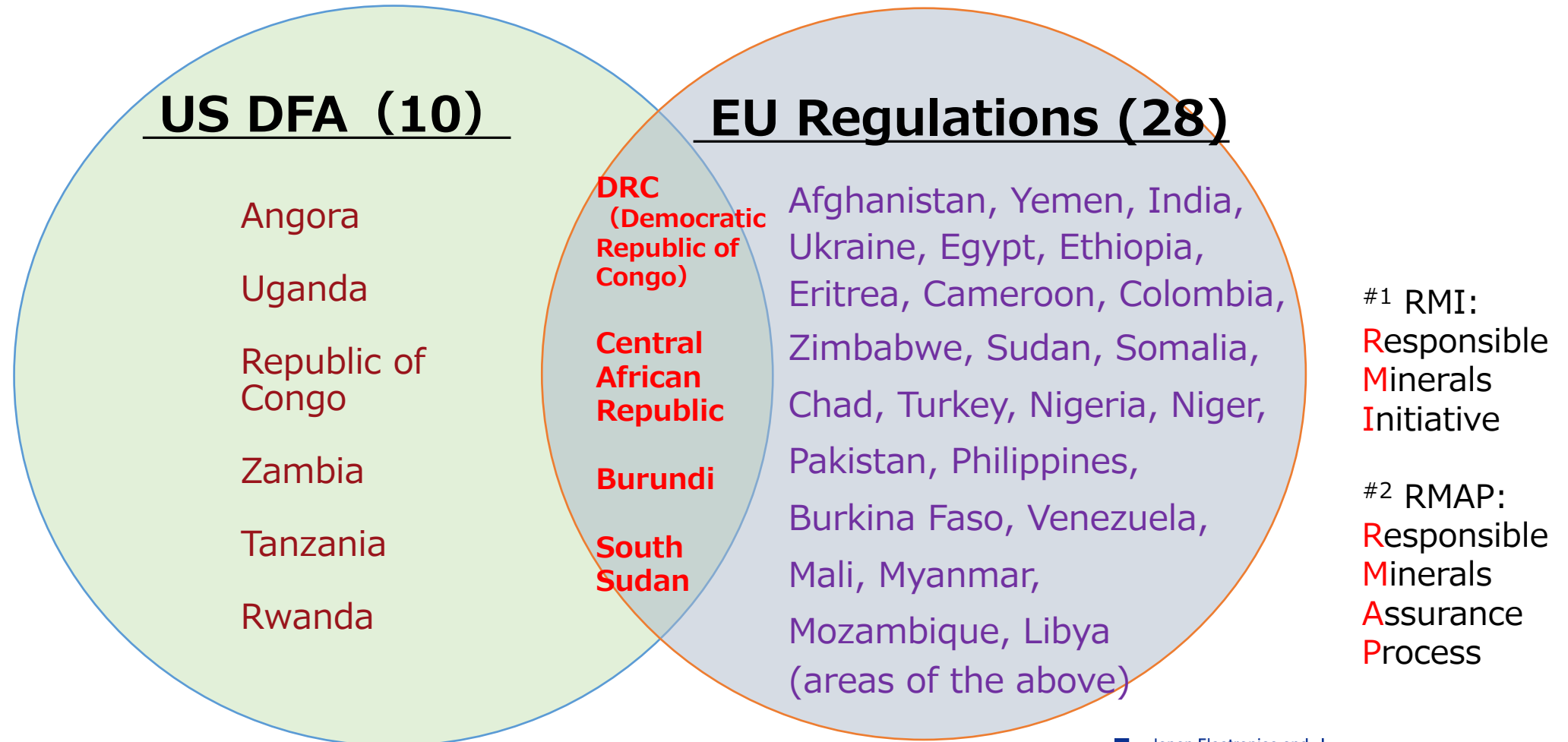
Release of subsequent revised lists. In the Dec. 2022 ver. list, Mexico was removed.

CAHRAs' designated countries/areas (Mar. 2023 ver.): 28 countries, 291 areas

Democratic Republic of Congo, Central African Republic, Burundi, South Sudan, Afghanistan, Yemen, India, Ukraine, Egypt, Ethiopia, Eritrea, Cameroon, Colombia, Zimbabwe, Sudan, Somalia, Chad, Turkey, Nigeria, Niger, Pakistan, Philippines, Burkina Faso, Venezuela, Mali, Myanmar, Mozambique, Libya
(countries or areas of the above)

1. Conflict Minerals Survey: CAHRAs in RMAP Audit

RMI^{#1} defines CAHRAs in RMAP Audit^{#2} as “Covered countries in the DFA regulation” + “CAHRAs in EU regulation” + “Countries/areas identified by a smelter”



1. Conflict Minerals Survey: For most Japanese companies

While US **unlisted companies** have no information disclosure obligation under the Dodd-Frank Act, their **customers** are requiring them to conduct conflict minerals surveys and report the results. Because modern supply chains stretch worldwide, manufacturers and many other companies are involved in these surveys.

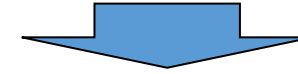
The EU Conflict Minerals Regulation, on the other hand, targets only companies importing ores and raw metals into the EU, so **fewer Japanese companies are involved**. However, the EU has clearly stated in its 2023 review that if downstream companies are less responsive than importers, it will also make reporting compulsory for downstream companies, so care must be taken in this regard.

In addition, as of January 2019, the **RMAP audit protocol** has changed to the 2017 version of the standards for the minerals, risks and regions noted below. Smelters that cannot conform with these standards cannot acquire RMAP conformant status. If a smelter in your supply chain is no longer conformant, **you may be asked by your customers to remove it from the supply chain**.

	FY2013 version	FY2017 version
Minerals	3TG (Tantalum, Tin, Tungsten, Gold)	3TG (Tantalum, Tin, Tungsten, Gold)
Risk	Source of funds for armed groups	OECD Annex II
Region	Covered countries (DRC+9)	CAHRAs

1. Conflict Minerals Survey: RMAP

Involves huge cost and time for companies to do their own audits of 3TG origin



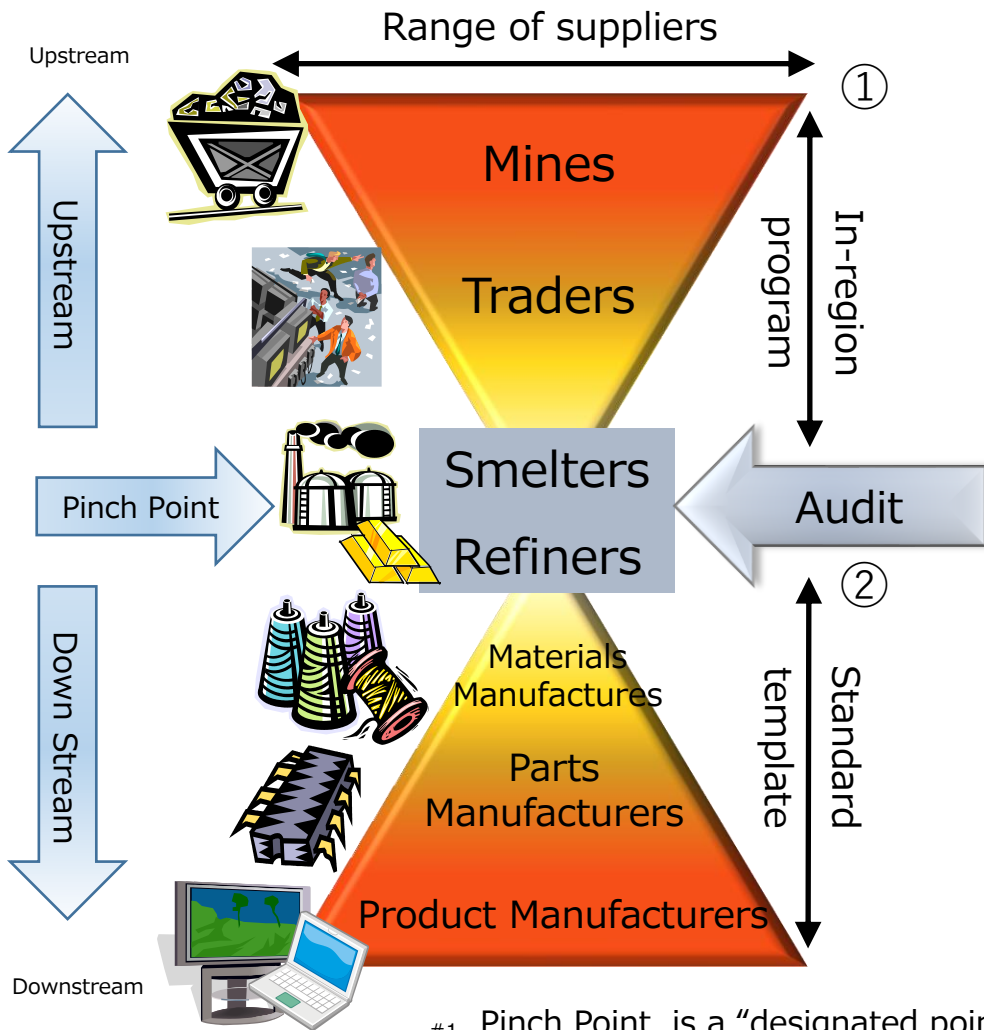
RMAP Investigation

To improve survey efficiency, the long supply chain hierarchy is divided in 2 tiers, with smelters (“Pinch Point” #1) in the middle, as the number of smelters are relatively small.

- From smelters upstream, smelters are audited through the RMAP program in the region to determine the origin of smelted minerals
- From smelters downstream, the **CMRT** #2 is used to streamline surveys.

The scheme of RMAP is scheduled to be certified in EU Regulation.

DAP#3 was developed for downstream companies in addition to RMAP. Japanese companies may be requested by client companies to receive DAP based audit; therefore, it is recommended that you check the contents of DAP and implement self-assessment of your company’s actions in advance.



#1 Pinch Point is a “designated point” defined in the OECD Guidelines and mean smelters, refiners and processors.

#2 CMRT (Conflict Minerals Reporting Template)

#3 DAP (Downstream Assessment Program)

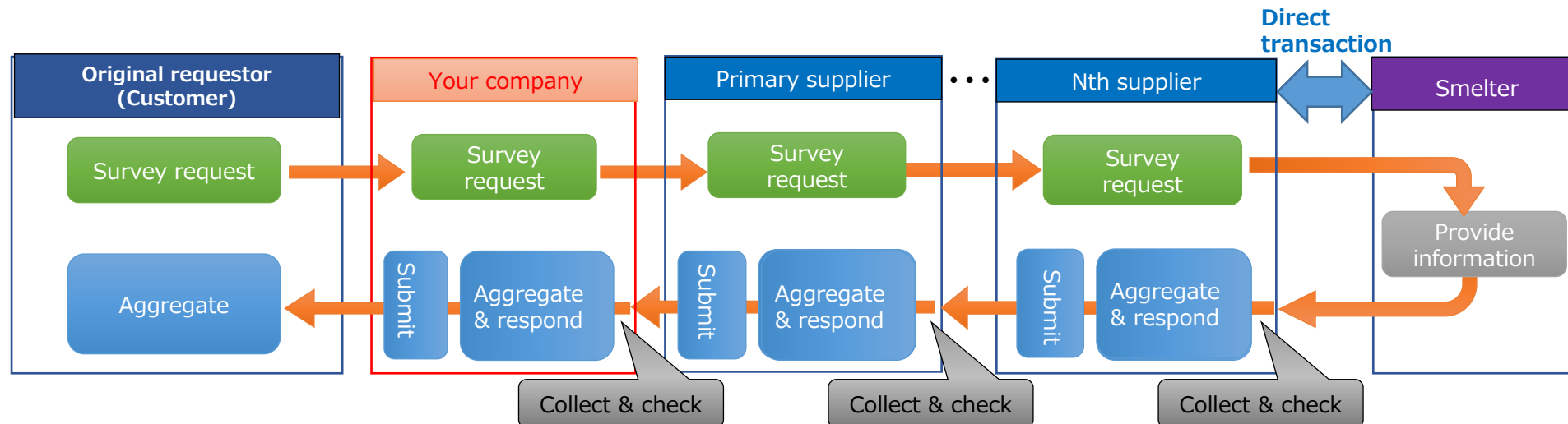
1. Conflict Minerals Survey: Survey flow

Survey flow for **companies downstream from smelters**

- ① Primary suppliers asked to fill in the CMRT
- ② CRMT survey requests move back up the supply chain
- ③ Survey requests reach smelters

Completed CMRT submission

- ④ Smelters submit to its direct customer/s
- ⑤ Where necessary, companies **aggregate multiple CMRTs** to create their own CMRT for submission to its direct customer/s
- ⑥ CMRT submitted to the customer/s who originally requested the survey



Conflict Minerals Survey: RMI SSN Status

Number of **S**tandard **S**melter **N**ames (SSN) recognized by RMI and their conformance status (does not cover all smelters in the world)

Ta Tantalum	'22/05	'23/05
SSN total:	36	36
Conformant ^{#1} :	35	33
Conformant ratio:	97%	92%
Active ^{#2} :	0	1

Sn Tin	'22/05	'23/05
SSN total:	80	89
Conformant:	54	63
Conformant ratio:	68%	71%
Active:	8	4

W Tungsten	'22/05	'23/05
SSN total:	53	58
Conformant:	42	37
Conformant ratio:	79%	64%
Active:	4	0

Au Gold	'22/05	'23/05
SSN total:	176	178
Conformant:	99	96
Conformant ratio:	56%	54%
Active:	8	5

#1 Conformant: RMAP Conformant Smelters

#2 Active: Smelters undergoing or scheduled for RMAP Audit

'22/05: as of 2022/5/11

'23/05: as of 2023/5/11

2. CMRT Rev. 6.31 Outline and Changes

2 . Outline of CMRT Rev. 6.31: Structure

The CMRT comprises an 8-page Excel file

Conflict Minerals Reporting Template (CMRT)

Select Language Preference Here:
请选择您的语言:
사용할 언어를 선택하십시오:
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Seleccione Preferència de idioma Aquí:
Wählen sie hier die Sprache:
Selezionare el linguaie de preferenza aqui:
Burada Dil Tercihini Belirleyin:

English

Choose language

Confirm revision

Revision 6.31
May 26, 2023

Link to Terms & Conditions

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	
Declaration Scope or Class (*):	
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	
Email - Contact (*):	
Phone - Contact (*):	
Authorizer (*):	
Title - Authorizer:	
Email - Authorizer (*):	
Phone - Authorizer:	
Effective Date (*):	

Answer the following questions 1 - 8 based on the declaration scope indicated above

Revision Instructions Definitions Declaration Smelter List Checker Product List Smelter Look-up

- Revision
- Instruction
- Definitions
- Declaration
- Smelter List
- Checker
- Product List
- Smelter Look-up

※Red Letters indicate sheets that need to be completed (3 sheets)

2. Outline of CMRT Rev. 6.31: Role of Each Sheet

Revision	Instructions	Definitions	Declaration	Smelter List	Checker	Product List	Smelter Look-up
----------	--------------	-------------	-------------	--------------	---------	--------------	-----------------

Role of each Sheet

- Revision: Record of revisions
- Instruction: Explanation on background and how to fill in the sheets
- Definitions: Definitions of terminology
- **Declaration**: Company Information (Q1-8 and A-H) <REQUIRED>
- **Smelter List**: List of smelters <WHERE NECESSARY^{#1}>
- **Checker**: Checks whether all necessary information has been filled in <CHECK REQUIRED^{#2}>
- **Product List**: List of target products < WHERE NECESSARY ^{#3}>
- Smelter Look-up: List of smelters^{#4} (List of smelters at the time of CMRT issuance)

Notes:

#1 Fill in for **metals** to which you responded “Yes” in Q2 of “Declaration”

#2 Fill in any areas **marked in red** on the Checker Sheet

#3 Fill in where the scope is “**B: Product**”

#4 This is a list of smelters at the time of CMRT issuance
The latest list can be found on the RMI website

※ Please read “Instructions” and “Definitions” before filling in the form.

2. Changes in CMRT Rev. 6.31 (2023)

Rev. 6.22 (2022/5/11) ⇒ Rev. 6.31※ (Current version 2023/5/26)

※Rev. 6.3 was issued on May 5, 2023 but was reissued as 6.31 on May 26, 2023 due to detection and fixing of bugs.

Only minor revisions (bug fixes and update of Smelters' information in the Smelter Look-up sheet) were made and **no revisions that may have impact on the practice of survey were made**

3. How to Complete the CMRT

3. How to Complete the CMRT 3.1 Declaration Sheet - Composition -

The image shows a screenshot of the Conflict Minerals Reporting Template (CMRT) Declaration Sheet. The form is divided into three main sections, each highlighted with a red box and a corresponding letter in a red circle:

- Section A:** Questions related to your company's company information (14 questions). This section includes fields for company name, address, and other basic information.
- Section B:** Questions related to the status of your 3TG use (summary of primary supplier information) (8 questions). This section includes questions about the percentage of 3TG used in products, the percentage of 3TG used in products, and the percentage of 3TG used in products.
- Section C:** Questions related to your Responsible Sourcing Procurement policies and actions (8 questions). This section includes questions about the company's policies and actions regarding responsible sourcing.

The Declaration Sheet is composed of three blocks

- Ⓐ Questions related to your company's **company information** (14 questions)
- Ⓑ Questions related to the status of your **3TG use** (summary of primary supplier information) (8 questions)
- Ⓒ Questions related to your **Responsible Sourcing Procurement policies and actions** (8 questions)

3. How to Complete the CMRT

3.1 Declaration Sheet

Ⓐ Company Information

Company Information

Company Name (*):	
Declaration Scope or Class (*):	
Description of Scope:	A. Company B. Product (or List of Products) C. User defined [Specify in 'Description of scope']
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	
Email - Contact (*):	
Phone - Contact (*):	
Authorizer (*):	
Title - Authorizer:	
Email - Authorizer (*):	
Phone - Authorizer:	
Effective Date (*):	

All items marked with an asterisk (*) must be completed (highlighted in yellow)

Use the pulldown menu to choose from options A to C. The party making the report (your company) usually decides the "Description of Scope", but in some cases it is decided by the customer.

Note: If you intend to send the Supplier's Declaration Sheet to your client company, you must take proactive measures (such as obtaining the supplier's permission) because sharing contact information of individuals stated in the Sheet may violate Private Information Protection Law in countries that have such law.

DD-MMM-YYYY format
Example: 01-May-2023

- A. Company: Applies to **ALL** your company's products
- B. Product: Applies only to **SOME** of your products
→ Fill in the Product List Sheet (see next page)
- C. User defined: Applies within the **product scope** defined by your company
→ Specify the product scope in the "Description of Scope" field

3. How to Complete the CMRT

3.1 Declaration Sheet A Company Information

If you choose **B. Product (or List of Products)**, the line “Go to Product List tab to enter products this declaration applies to” will appear as below, along with a “[Click here...](#)” instruction under “B. Product”

Company Information

Company Name (*):	
Declaration Scope or Class (*):	B. Product (or List of Products)
Go to Product List tab to enter products this declaration applies to	Click here to enter the products this declaration applies to

Clicking as instructed will take you to the Product List Sheet. Please fill in a number recognizable by both the customer and supplier (e.g. a number specified in the exchanged purchase/delivery specification) or product name

Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.

[Click here to return to Declaration tab](#)

Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments

Navigation: > Revision | Instructions | Definitions | Declaration | Smelter List | Checker | **Product List** | Smelter Look-t ... + : ◀ ▶

3. How to Complete the CMRT

3.1 Declaration Sheet

Ⓑ 3TG Use Status

For each question, choose the pulldown for each 3TG, and enter your answer. You do not need to answer for any metal for which you answered "No" to Q1. If you answered "Yes" to Q1 but "No" to Q2, you don't need to answer from Q3 onward.

Answer the following questions. 1. If based on the declaration scope indicated above.

Question	Answer	Comment
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
2) Does any 3TG remain in the product(s)? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (80C items, see definition table) (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
7) Have you identified all of the smelters supplying the 3TG to your supply chain? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	
8) Has all applicable smelter information received by your company been reported in this declaration? (%)	Titanium (%) Tin (%) Gold (%) Tungsten (%)	

- 1) Is any 3TG intentionally added or used in the product(s) or in the production process?
- 2) Does any 3TG remain in the product(s)?
- 3) Do any of the smelters in your supply chain source the 3TG from the covered countries?
- 4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas?
- 5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?
- 6) What percentage of relevant suppliers have provided a response to your supply chain survey?
- 7) Have you identified all of the smelters supplying the 3TG to your supply chain?
- 8) Has all applicable smelter information received by your company been reported in this declaration?

1) Is any 3TG intentionally added or used in the product(s) or in the production process?

Yes: Answer “Yes” if you intentionally add or use a 3TG because it is necessary to the functionality or production of a product, regardless of the amount.

No: Answer “No” if you do NOT intentionally add or use a 3TG, even if products include trace-level 3TG contaminants.

※ If **even one of the suppliers** from which you have received a CMRT answers “Yes” in relation to any of the 3TGs, your answer here must also be “Yes.”

※ If you answered “No,” no further answers are necessary as of Q2 (option grayed out).

Examples of metals necessary to the functionality or specifications of a product:

- Products assembled from parts using gold or tungsten alloys
- Tin used as a coating or synthetic resin additive
- Stannane (a tin compound) used as a glass coating agent

Examples of metals necessary to production process:

- Stannane (in other words, tin) used as a **catalyst**
- Float glass tin
- Tantalum compounds, etc., used as welding rods

Exclusions:

- **Production equipment** is excluded because no 3TGs remain in the finished product. Tungsten carbide blades and drill bits used for cutting are production equipment and are therefore excluded.
- **Packaging materials** are not used as products by final customers and are therefore excluded.

2) Does any 3TG **remain** in the product(s)?

Yes: If the 3TG remains in the product

No: If the 3TG does not remain in the product

- ※ **If even one of the suppliers** from which you have received a CMRT answers “**Yes**” in relation to any of the 3TGs, your answer here must also be “**Yes**.”
- ※ If you answered “**Yes**”, you must fill in the Smelter List Sheet.
- ※ If you answered “**No**”, no further answers are necessary from Q3 onward (option grayed out).

If a 3TG is added because it is necessary to the functionality or specifications of a product, it will obviously remain in the product, so you should answer “**Yes**”. If 3TGs such as tin used as a catalyst in the production process, float glass tin, and tantalum used as welding rod, remain in the product, the answer should be “**Yes**”.

3) Do **any** of the smelters in your supply chain source the 3TG from the **covered countries**?

Yes: If any of the smelters in your supply chain sources from Covered Countries

No: If none of the smelters in your supply chain sources from Covered Countries

Unknown: If it is unclear whether smelters in your supply chain source from Covered Countries

※ If **even one of the suppliers** from which you have received a CMRT answers “**Yes**” in relation to any of the 3TGs, your answer here must also be “**Yes**”.

On the other hand, even if all CMRT answers that you receive are “**No**”, if “not all smelters are identifiable (if your answer in Q7 is “**No**”)”, your answer here must be “**Unknown**.”

If you answer “Yes”, you must substantiate this in the Comments field. For example, if you know the **smelter name or CID number**, this can be used to determine the smelter’s third-party certification status. If you also know the country of origin, an RCOI (Reasonable Country of Origin Inquiry) can be undertaken. If you receive an CMRT with a “Yes” answer to Question 3 with no substantiation in the Comments field, please ask for specific information to be added.

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)		Answer	Comments
Tantalum (*)	No	Examples	
Tin (*)	Yes		CID987654(DRC),CID111111(Rwanda)
Gold (*)	Yes		CID123456,CID000999
Tungsten (*)	Yes		

Must be completed

4) Do **any** of the smelters in your supply chain source the 3TG from **conflict-affected and high-risk areas (CAHRAs)**?

Yes: If even one of the suppliers from which you have received a CMRT sources from the CAHRAs

The RMI stipulates that CAHRAs shall include the covered countries defined in DFA, so if you answered “**Yes**” to Question 3, you should also answer “**Yes**” to this Question 4.

No: If none of the smelters in your supply chain source from CAHRAs

Unknown: If it is unclear whether they source from CAHRAs

※ If even one of the suppliers from which you have received a CMRT answers “**Yes**” in relation to any of the 3TGs, your answer here must also be “**Yes**.”

On the other hand, even if all CMRT answers that you receive are “**No**”, if “not all smelters are identifiable (if your answer in Q7 is “**No**”)”, your answer here must be “**Unknown**”.

「If you answer “**Yes**”, as in Q3, you must substantiate this in the Comments field. For example, if you know **the smelter name and CID number**, this can be used to determine the smelter’s third-party certification status. If you also know the country of origin, an RCOI (Reasonable Country of Origin Inquiry) can be undertaken. If you have received a CMRT with a “**Yes**” answer to Question 4 with no substantiation in the Comments field, please ask for specific information to be added.

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?

- Yes:** If 100% of the 3TG comes from recycled or scrap sources
No: If some of the 3TG comes from natural (mined) resources
Unknown: Unclear whether 100% of the 3TG comes from recycled or scrap sources

※ If **even one** of the suppliers from which you have received a CMRT answers “**No**” in relation to any of the 3TGs, your answer here must also be “**No**”.
Only if answers in all CMRTs are “**Yes**,” your answer will be “**Yes**”.

6) What percentage of relevant suppliers have provided a response to your supply chain survey?

Choose one of the following options according to the **percentage of answers received from suppliers subject to the survey**. What percentage of relevant suppliers have provided a response to your supply chain survey?

- 100%: Receive answer from all suppliers
- Greater than 90%: Receive answer from more than 90% of suppliers
- Greater than 75%: Receive answer from more than 75% of suppliers
- Greater than 50%: Receive answer from more than 50% of suppliers
- 50% or less: Receive answer from 50% or less of suppliers
- None: Receives no answer from suppliers

※ Unrelated to the contents of the answer to Question 6 received from suppliers

Suppliers excluded from the scope of the CMRT:

- Suppliers of equipment, tools, consumables, and other products outside the scope of the CMRT
- Suppliers of parts and materials which clearly do not contain 3TGs

Note: **Surveys must be continued until the response rate is 100%.**

7) Have you identified all of the smelters supplying the 3TG to your supply chain?

Yes: If you have identified all of these smelters

No: If you have not identified even one smelter supplying the 3TG to your supply chain

You can only answer “Yes” if you **meet all four of the conditions below:**

- ① You have received CMRTs from all the relevant suppliers
(=**your answer to Q6** was **100%**).
- ② The answer to **Q6** in all the CMRTs you received was **100%**.
- ③ The answer to **Q7** in all the CMRTs you received was “Yes”.
- ④ The answer to **Q8** in all the CMRTs you received was “Yes”.

※ If you answered “No” to this question (i.e., you have not identified all of the relevant smelters), you may be asked by customers to work toward being able to give a “Yes” answer, and to give a timeframe for that.

8) Has all applicable smelter information received by your company been reported in this declaration?

Yes: You have reported all applicable smelter information received by your company

No: You have not reported some of the applicable smelter information received by your company

※ Unrelated to the contents of the answer to Question 8 received from suppliers

The answer will usually be “**Yes**,” but it may be “**No**” if you have not reported all applicable information due to reasons such as your confidentiality obligation to a supplier.

Choose the pull-down to answer each of the 8 questions on your company's policies and actions in relation to responsible minerals sourcing.

Question	Answer
A. Have you established a responsible minerals sourcing policy? (*)	<input type="text"/>
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	<input type="text"/>
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	<input type="text"/>
D. Have you implemented due diligence measures for responsible sourcing? (*)	<input type="text"/>
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	<input type="text"/>
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	<input type="text"/>
G. Does your review process include corrective action management? (*)	<input type="text"/>
H. Is your company required to file an annual conflict minerals disclosure? (*)	<input type="text"/>

- A. Have you established a responsible minerals sourcing policy?
- B. Is your responsible minerals sourcing policy publicly available on your website?
- C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?
- D. Have you implemented due diligence measures for responsible sourcing?
- E. Does your company conduct conflict minerals survey(s) of your relevant supplier(s)?
- F. Do you review due diligence information received from your suppliers against your company's expectations?
- G. Does your review process include corrective action management?
- H. Is your company required to file an annual conflict minerals disclosure?

“Unrelated to the contents of CMRTs received from suppliers”

A. Have you established a responsible minerals sourcing policy?

Yes: If your company has established a responsible minerals sourcing policy

No: If your company has NOT established a responsible minerals sourcing policy

To answer “Yes”, your responsible minerals sourcing policy must cover all the elements below and **at a minimum include those items in brackets**

- * Metals covered (3TG)
- * Risk covered (OECD Annex II risk)
- * Regions covered (CAHRAs)
- * Response when a risk is identified

※ The above policy regarding 3TGs is sufficient for DFA and EU Regulations, however, taking into consideration the expansion of target minerals and risks, it is preferable to refer also to matters such as influence on the environment.

The above policy does not necessarily have to be a independent “**Responsible Minerals Sourcing Policy**”; a “**Responsible Sourcing Policy**” that includes the above items written in red is sufficient.

B. Is your responsible minerals sourcing policy publicly available on your website?
(Note – If “Yes”, the user shall specify the URL in the Comments field.)

Yes: If your responsible minerals sourcing policy is publicly available on your website

No: If you have no website or your responsible minerals sourcing policy is not posted on your website

C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?

Yes: If, in the form of your company's policies, a written sourcing request, or an e-mail request, etc., you require your direct suppliers to source from smelters whose due diligence practices have been validated by an independent third-party audit program

No: If you do not require this from or clearly indicate this to your direct (primary) suppliers.

*Independent third-party audit programs include the following:

London Bullion Market Association (LBMA), Responsible Jewellery Council (RJC)

Some customers press for "all smelters in the supply chain to be RMAP conformant" and strongly urge for "any smelters that fail to do so to be removed from the supply chain". If the CMRTs you receive from suppliers note non-RMAP conformant smelters, we recommend going through the supply chain to notify these smelters of the above and urge them to acquire conformant status.

D. Have you implemented due diligence measures for responsible sourcing?

Yes: If you have implemented due diligence measures such as the examples below

No: If you have not implemented due diligence measures

Examples of measures:

- Highlighting and assessing risks from CMRTs received from suppliers
⇒ e.g. Ranking the rates of receipt of CMRTs and the precision of smelter list information, etc.
- Creating and implementing strategies for dealing with identified risks
⇒ e.g. Determining and implementing action rules based on the status of responses to Questions A-H.
- Prior written confirmation and agreement with suppliers on actions that will be taken when a connection with armed groups is identified.

※ Due diligence = Risk assessment

Activities to make the supply chain transparent, check for any risks such as human right abuse in the origin of raw material, and **correct any problems that are found.**

E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?

Yes (IPC-1755) ※ : If you conduct conflict minerals surveys of your relevant suppliers using the **CMRT format**

Yes (other format): If you conduct conflict minerals surveys of your relevant suppliers in **a format other than the CMRT** (describe such format in the Comments field)

No : If you do not collect conflict minerals due diligence information from your suppliers

※ IPC-1755: A standard establishing the requirements for exchanging data between suppliers and their customers in regard to the responsible sourcing of minerals, and establishing the requirements of the 3TG, cobalt and mica survey

F. Do you review due diligence information received from your suppliers against your company's expectations?

Yes: If you have a process for reviewing CMRTs (DD information) received from suppliers

No: If you do not review CMRTs (DD information) received from suppliers

Review process examples:

- Review the accuracy and completeness of supplier CMRTs.
- Review whether suppliers have a responsible minerals sourcing policy, or review their actions based on their responses to Questions C-H.
- Assess the certification status of smelters on the Smelter List.

✓ **Point:**

It is important not just to collect supplier responses but to check the content of the responses received. If you think there are any risks, you should go back up the supply chain or use the Internet to check this.

G. Does your review process include corrective action management?

Yes: If you have the kind of corrective action management process noted below

No: If you don't have a corrective action management process

Examples of corrective action management:

- If a supplier does not have a responsible minerals sourcing policy, encouraging them to develop one.
- If a smelter on the Smelter List is not RMAP-conformant, go up the supply chain to encourage them to undergo an RMAP audit.
- If a supplier scores poorly in your CMRT review process as noted in Question F, ask the supplier to address those issues.

H. Is your company required to file an annual conflict minerals disclosure?

- Yes, with the SEC** : If you are listed on the SEC (US Securities and Exchange Commission)
- Yes, with the EU** : If your company falls within the scope of the EU Conflict Mineral Regulation
- Yes, with the SEC and EU:** If you are required to report to both the SEC and the EU
- No** : If you are required to report to neither

Most Japanese companies will answer “No” to this question.

On the Smelter List, you enter information on all smelters in your supply chain. The sheet comprises 17 items.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Smelter Identification Number	Metal	Smelter Look-up (*)	Smelter Name (1)	Smelter Country	Smelter Identification Number	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province	Smelter Contact Name	Smelter Contact	Proposed next steps	Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap sources?	Comments

1. Smelter Identification Number Input Field
 2. Metal (*)
 3. Smelter Look-Up (*)
 4. Smelter Name (1)
 5. Smelter Country (*)
 6. Smelter Identification Number
 7. Source of Smelter Identification Number
 8. Smelter Street
 9. Smelter City
 10. Smelter Facility Location: State / Province
 11. Smelter Contact Name
 12. Smelter Contact Email
 13. Proposed next steps
 14. Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"
 15. Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"
 16. Does 100% of the smelter's feedstock originate from recycled or scrap sources?
 17. Comments
- (*) Compulsory fields

Before filling in the Smelter List, please make the following preparations:

- ✓ List all the smelters that are listed in all CMRTs that you received
- ✓ Use CID numbers, etc., **to remove duplications** (name identification)
- ✓ If your list contains non-SSN smelters without CID numbers, check on their website, etc., to confirm whether **they really are operating smelters** (due diligence)
- ✓ Delete trading companies and other businesses which are clearly not smelters

In some cases, smelters that were SSNs may have become non-SSNs. For example, they may have:

- Ceased to operate as a smelter
- Amalgamated with another smelter
- Been discovered not to be a smelter

The SSNs listed on the Smelter Look-up Sheet are SSNs **at the time of CMRT issuance**[※], and there are some cases where RMI subsequently recognizes a smelter as an SSN and gives it a CID number (you can check this on the RMI website). [※]In CMRT Rev.6.31, SSNs as of March 20, 2023 are listed

Even in these cases, for the purposes of this CMRT, the smelter will be deemed “Smelter not listed.”

Glossary of Frequently Used Terms

CID: An ID assigned to identify a company as a “company that RMI is aware that it is reported as a smelter”. **However, it may not necessarily be a “smelter”.**

SSN: An abbreviation for Standard Smelter Names. A **company that RMI determines “as a smelter”** from its survey. The SSN List may be confirmed at the RMI HP. “SSN” is not equal to “Conformant”.


Conformant Facilities List: A list of SSN companies that passed (are conformant to) the RMAP Audit (including those that passed the mutual certification system).

Active Facilities List: List of companies that RMI acknowledges as undergoing or preparing to undergo a RMAP.

① If you already know the CID number

When you enter the CID number into Field A, Fields B, C, E, F, G, I, and J will be automatically populated.

We recommend copying and pasting CID numbers into Field A.

A	B	C	D	E	F	G	H	I	J
<p>TO BEGIN:</p> <p>Option A: If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.</p> <p>Option B: If you have a Metal and Smelter Look-up name combination, complete the following steps: Step 1. Select Metal in column B Step 2. Select from dropdown in column C (wrong combination will trigger RED color)</p> <p>Option C: If you have a Metal and Smelter Name combination, complete the following steps: Step 1. Select Metal in column B Step 2. Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E Step 3. Enter all available smelter information in columns H through Q</p> <p>(*) Mandatory fields are noted with an asterisk. (1) Entry required when Smelter Look-up = "Smelter not listed"</p> <p>NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by contacting RMI@responsiblebusiness.org.</p>  <p>© 2023 Responsible Minerals Initiative. All rights reserved.</p>									
Smelter Identification Number Inp	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identificatic	Source of Smelter Identificatic	Smelter Street	Smelter City	Smelter Facility Location: State / Province
CID002920	Gold	ABC Refinery Pty Ltd.		AUSTRALIA	CID002920	RMI		Marrickville	New South Wales

Enter the CID number in Field A

Fields B, C, E, F, G, I, and J will be populated automatically

② If you don't know the CID number

If you select **a metal in Field B** and chose **the appropriate smelter name in Field C**, Fields E, F, G, I, and J will be populated automatically.

You can copy and paste data into Fields B and C, but if the data in Field C does not exactly match the data in the Smelter Look-up field on the Smelter Look-up Sheet, Fields E, F, G, I, and J will not be populated automatically even if it is a SSN (such smelter has a CID number).

③ If there are no selection options in Field C (non-SSN smelter)


Once you have selected **the metal in Field B**, select **"Smelter not listed"** in Field C, and enter **the smelter name in Field D** and **the smelter country in Field E**. All these fields are compulsory, but please also enter data in Fields H-P to the best of your ability.

④ If there are any Smelters that the name or location is not identified

Select **the metal in Field B** and chose **"Smelter not yet identified"** in Field C.

A	B	C	D	E	F	G	H	I	J
Smelter Identification Number Inp	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identificatic	Source of Smelter Identificatic	Smelter Street	Smelter City	Smelter Facility Location: State / Province
	Gold	ABC Refinery Pty Ltd.		AUSTRALIA	CID002920	RMI		Marrickville	New South Wales
	Gold	Smelter not listed	ABCDEF	CANADA		Enter smelter details			
	Gold	Smelter not yet identified							

If your Declaration Scope or Class is “**B. Product (or List of Products)**”, you must complete the **Product List**.

 <p>Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.</p> <p>Click here to return to Declaration tab</p>		
Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments

Manufacturer's Product Number (**compulsory**): Enter a number recognizable by both the customer and supplier (e.g. a number specified in the exchanged purchase/delivery specification)

Manufacturer's Product Name: Enter a product name recognizable by both the customer and supplier

Comments: Enter where necessary

After completing the Declaration Sheet, Smelter List Sheet, and Product List Sheet, please use the Checker Sheet to check that you **have populated all the necessary fields**.

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red			
Click here to return to Declaration tab	Click here to return to Smelter List	Click here to return to Product List	③ Required fields remaining to be completed 47
Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*):	ABCDEF	Complete	
Declaration Scope or Class (*):	A. Company	Complete →	
Description of Scope:	②	Complete	
Contact Name (*):		Incomplete → Provide contact name in Declaration tab cell D15	Click here to enter Contact Name
Email – Contact (*):		Provide a valid email for contact in Declaration tab cell D16	Click here to enter Email-Contact
Phone – Contact (*):	81-3-123-4567	Complete	

① Select Checker Sheet to confirm your data entry.

- ① Select Checker Sheet to confirm your data entry.
- ② Areas in green are complete; areas in red are incomplete.
- ③ When the “Required fields remaining to be completed” value is “0”, your data entry is complete.

Ref: RMAP status terminology

RMAP (Responsible Minerals Assurance Process)

www.responsiblemineralsinitiative.org/members/database-field-definitions/

Status	Description	Further description
Conformant	Audited and found conformant with the relevant RMAP standard	RMAP Conformant Smelters
ECAP	Extended Corrective Action Plan	Smelters that are currently non-conformant, but have committed to address outstanding issues
Active	Engaged in the program but not yet conformant	Smelters that are undergoing or have committed to undergo a RMAP Audit
In Communication	Not yet active but in communication with RMAP and/or member company	Smelters that have initiated communications toward participating in a RMAP Audit
Outreach Required	Outreach needed by RMI member companies to contact entity and encourage their participation in RMAP audit	Smelters not yet "In Communication" and need encouragement to participate in a RMAP Audit
Non-Conformant	Audited but found not conformant with the relevant RMAP standard	RMAP Non-Conformant Smelters
Eligible	Meets the definition of a smelter / refiner; included in the CMRT Standard Smelter List	Meets the definition of Smelters and is included in CMRT Standard Smelter List
Not Applicable	Not eligible for the RMAP	Not eligible for the RMAP Audit (is not a smelter)
Audit(Assessment) Cycle	Indicates the time period from the last audit date to the next planned re-audit date.	The time period from the last audit date to the next planned re-audit date: 1 year: Standard audit period for RMAP smelters 3 years: Audit period for smelters in a risk-based audit program and TI-CMC members [※]

Ref: Conflict Mineral Survey Abbreviations (2023)

Abbreviation	Category	Description
3TG	Survey Related	Tantalum, Tin, Tungsten, Gold
ASM	Organization	Artisanal and Small-scale Mining
CAHRAs	Name of Country/Area	Conflict-Affected High-Risk Areas
CCCMC	Organization	China Chamber of Commerce for Importers & Exporters for Minerals, Metals & Chemicals
CI	Organization	Cobalt Institute
CMRT	Survey Related	Conflict Minerals Reporting Template
CRT	Survey Related	Cobalt Reporting Template
DD	Survey Related	Due Diligence
DFA	Law	Dodd-Frank Wall Street Reform and Consumer Protection Act
DRC	Name of Country/Area	Democratic Republic of the Congo
ECAP	Survey Related	Extended Corrective Action Plan
EMRT	Survey Related	Extended Mineral Reporting Template
GeSI	Organization	Global e-Sustainability Initiative
IPC	Organization	Association Connecting Electronics Industries
iTSCi	Organization	IRTI Tin Supply Chain Initiative
ITU	Organization	International Telecommunication Union
JEITA	Organization	Japan Electronics and Information Technology Industries Association
LBMA	Organization	London Bullion Market Association
LME	Organization	The London Metal Exchange
LSM	Organization	Large-Scale Mining
MRT	Survey Related	Mica Reporting Template
OECD	Organization	Organisation for Economic Co-operation and Development
OFAC	Organization	Office of Foreign Assets Control
PRT	Survey Related	Pilot Reporting Template
RBA	Organization	Responsible Business Alliance
RCI	Organization	Responsible Cobalt Initiative
RCOI	Survey Related	Responsible Country of Origin Inquiry
RJC	Organization	The Responsible Jewellery Council
RMAP	Survey Related	Responsible Minerals Assurance Process
RMI	Organization	Responsible Minerals Initiative
RMI	Organization	Responsible Mica Initiative
RRA	Survey Related	Risk Readiness Assessment (by RBA)
SDGs	Others	Sustainable Development Goals
SEC	Organization	U.S. Securities and Exchange Commission
SOR	Survey Related	Smelter or Refiner
SSN	Survey Related	Standard Smelter Name

JEITA

**Japan Electronics and Information
Technology Industries Association**