How to complete the Extended Minerals Reporting Template "EMRT"

EMRT Rev. 1.2

June 2023
Japan Electronics and Information Technology Industries
Association (JEITA)
- Responsible Minerals Trade Working Group -

[Notice]

This document is published by the JEITA Responsible Minerals Trade Working Group. We endeavor to ensure that our information on RMI templates for responsible mineral sourcing is as recent and accurate as possible, but please be aware that this will not always be the case.



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1. What is the EMRT?



1.1 What is the EMRT?

- ◆ The EMRT^{*1} is a template developed by the RMI to facilitate the transfer of information through the supply chain regarding country of origin of minerals used in products, and the smelters, refiners and processors being utilized. It is also a tool that supports the exercise of due diligence by companies in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs^{*2}).
 - *1 EMRT stands for Extended Minerals Reporting Template
 - ※2 As for details of CAHRAS, please refer to P.17
- ◆ Currently, minerals covered by the EMRT are cobalt and natural mica (as of June 2023).
- ◆ The EMRT was released in October 2021 by RMI. The current version is ver.1.2 (as of June 2023).
- ◆ By the release of the EMRT, the existing CRT (the template for reporting cobalt) and MRT (the template for reporting mica) were deleted from RMI website in the end of March 2022.

1.2 Changes from the CRT/MRT

Item	CRT Rev. 2.2	MRT Rev. 1.0	EMRT Rev. 1.02
Background /Law	No compliance requirement Growing international interest in human rights issues, etc.	No compliance requirement Growing international interest in human rights issues, etc.	No compliance requirement Growing international interest in human rights issues, etc.
Issuance date	NA	NA	NA
Subject of regulations	NA	NA	NA
Minerals covered	Cobalt	Natural Mica *Only the name of processor	Cobalt Mica (Natural Mica) (*including whether such mineral was used)
Regions covered	CAHRAs (Conflict-Affected and High-Risk Areas)	NA (Survey only to identify the name of processors/No risks covered)	CAHRAs (Conflict-Affected and High-Risk Areas)
Risks covered	OECD Annex II Risks	NA (Survey only to identify the name of processors/No risk covered)	OECD Annex II Risks

[◆]CRT (the template for reporting cobalt) and MRT (the template for reporting mica) were deleted from RMI website in the end of March 2022

1.3 Comparison with the CMRT <Reference>

Item	CMRT R	EMRT Rev. 1.2	
Background/ law	US DFA Section 1502	EU Conflict Minerals Regulation	No compliance requirement Growing international interest in human rights issues, etc.
Issuance date	Applied as of August 2012	Applied as of January 2021	NA
Subject of regulations	US listed companies	Companies importing minerals into the EU	NA
Minerals covered	Conflict minerals (3TG): Refers to the following 4 minerals (without regard to its origin) Tantalum, Tin, Tungsten, Gold		Cobalt Mica (Natural Mica)
Risks covered	Source of funds for armed groups	OECD Annex II Risks #2	OECD Annex II Risks
Regions covered	Democratic Republic of the Congo (DRC) and the nine adjoining countries	CAHRAs (Conflict-Affected and High-Risk Areas)	CAHRAs (Conflict-Affected and High-Risk Areas)



2. Background of survey and supply chains



2.1 Cobalt: Risks

Cobalt

Primary use:

Batteries, automobiles, metallic alloys, magnets, paints, etc. Especially demands for <u>lithium-ion batteries</u> used in PCs, smart phones, EVs, etc. is expected to continue to grow, and cobalt will attract attention as needs for cobalt used in such batteries will also grow.

Principal country of origin: The Democratic Republic of the Congo (DRC)

(At least 70% of global production, and at least 50% of the world's cobalt reserves)

Issues of concern: Child labor and unsafe working conditions at mining sites

Please visit RMI's Material Insights for details

Material Insights: https://www.material-insights.org/material/cobalt/

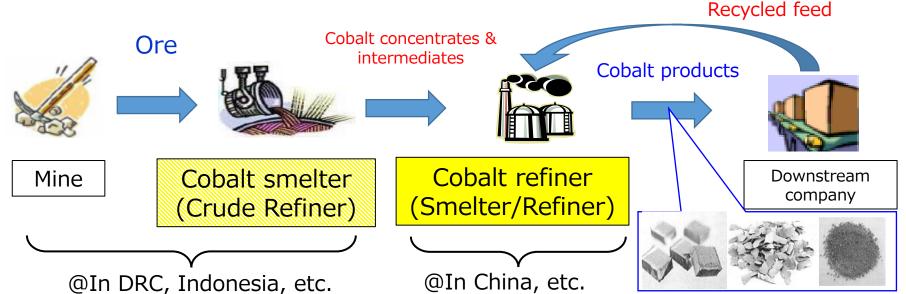


2.1 Cobalt: Supply chain Cobalt

A cobalt smelter/refiner is defined as an entity that processes cobalt concentrates, intermediates, or recycled feed and produces cobalt products for direct use in a downstream manufacturing process. Downstream manufactures need to conduct surveys right back up their supply chains, going as far back as to the smelters/refiners.

Crude refiners close to mines that refine metals from ore have recently begun receiving RMAP* assessments, and are beginning to appear on the Conformant and Active Smelter list.

(The cobalt industry and RMI use "Smelter" and "Refiner" interchangeably)



- ◆ Cobalt intermediates: Partially refined hydroxides, carbonates, metals, etc.
- ◆ Recycled feed:Industrial scrap and scrap from consumer goods scrap, etc.
- ◆ Cobalt products: Electrical cobalt, cobalt sulfate, cobalt briquettes, cobalt powder, etc.

*RMAP is RMI's Responsible Minerals Assurance Process

Japan Electronics and Information Technology Industries Association

2.1 Cobalt: SSN status

Cobalt

Number of smelters recognized as **Standard Smelter Names** by RMI and their conformant status (Does not cover all smelters in the world)

Comparison of the status as of June 2022 and May 2023

() number of Crude Refiners

SSN Total

91(8)

→ 84(11)

Conformant (Certified)

 $31(3) \rightarrow 37(4)$

Conformant ratio 44%

Active (Scheduled for assessment)

 $12(2) \rightarrow 11(2)$

Assessments are running behind schedule due to the COVID-19 pandemic. For current information about conformant status, please check the following:

https://www.responsiblemineralsinitiative.org/cobalt-refiners-list/



2.2 Mica: Risks

Mica

Primary use: Electrical Insulators in electrical products, insulating

materials, paints etc.

Principal country of origin: China(produces approx. 30% of global production), Finland, US, India, Madagascar

Issues of concern: Child labor and unsafe working conditions at mining sites of India and Madagascar that together produces approx. 12% of global production

Please visit RMI's Material Insights for details

Material Insights: https://www.material-insights.org/material/mica/



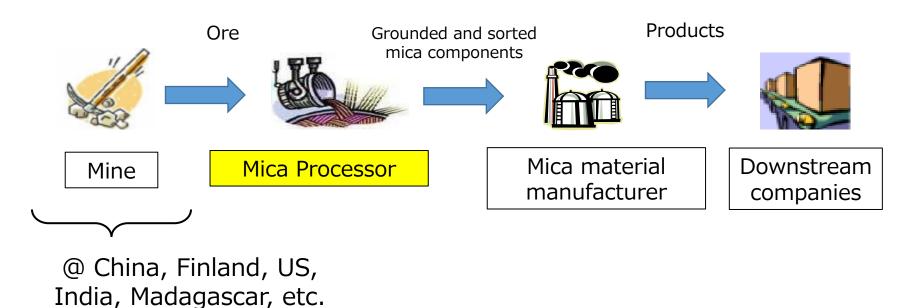
2.2 Mica: Supply Chain

Mica

Mica consists of 2 types: natural mica and synthetic mica. Only information on natural mica is required in the EMRT.

Mica processors separate ores including mica taken from mines into non-mica components and mica components by various physical or mechanical methods.

Downstream companies are required to identify the processors.





2.2 Mica: SSN Status

Mica

Number of smelters recognized as **Standard Smelter Names** (in the case of Mica, Processors) ** by RMI (Does not cover all smelters in the world) ** "Kakogyousha" described in the EMRT is equivalent to processors.

Comparison of the status as of June 2022 and May 2023

SSN Total

22 → **25**

Conformant (Certified) 0 → **Conformant ratio 0**%

Active (Scheduled for assessment)

 $3 \rightarrow 4$

Assessments are running behind schedule due to the COVID-19 pandemic. For current information about conformant status, please check the following:

https://www.responsiblemineralsinitiative.org/mica-processors-list/



3. OECD Annex II Risk



3. OECD Annex II Risks

OECD Annex II Risks:

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

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)



4. Conflict-Affected and High-Risk Areas (CAHRAs)



4.1 Definition of CAHRAs in OECD

OECD's definition of CAHRAs#1

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

<u>Armed conflict</u> 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.

<u>High-risk areas</u> 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



4.2 CAHRAs in the EU Regulations

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)

4.3 Definition in the EMRT

EMRT's definition of CAHRAs

RMI defines CAHRAs as <u>countries/areas identified by each company</u>, taking into consideration CAHRAs definition in OECD, the EU Conflict Minerals Regulation, etc. Please refer to the following website when identifying CAHRAs.

- ◆ Conflict Affected and High-Risk Areas (CAHRAs) (RMI)

 Indicates procedure guidance and information sources to identify CAHRAs

 http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/
- ◆Guidelines for the identification of CAHRAs and other supply chain risks under Regulation (EU) 2017/821 of the European Parliament and of the Council based on the EU Conflict Minerals Regulation (issued Aug. 10. 2018)

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018H1149



5. EMRT Rev. 1.2 Outline and Changes

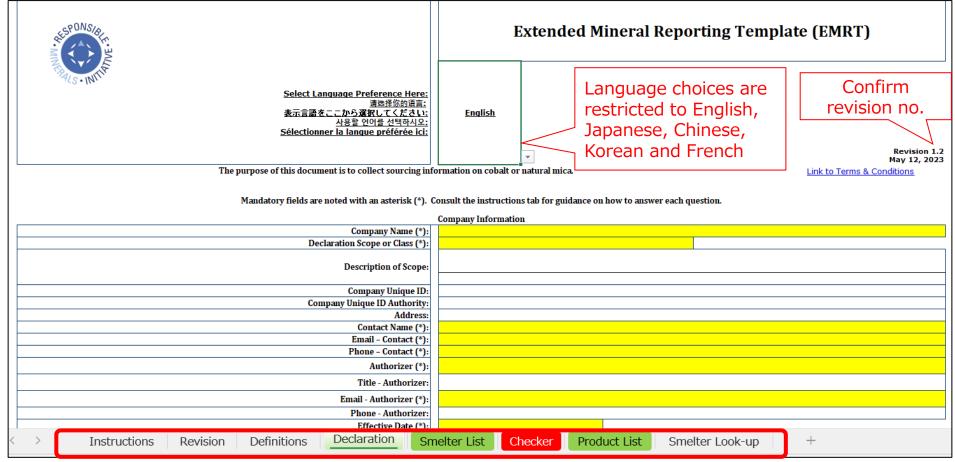


5. EMRT Rev. 1.2 Outline: Structure

The EMRT comprises an Excel file with 8 sheets

Instruction, Revision, Definitions, Declaration, Smelter List, Checker, Product List, Smelter Look-up (The role of each sheet will be explained on the next page)

You need to fill in THREE sheets: Declaration, Smelter List, and Product List



5. EMRT Rev. 1.2 Outline: Role of Each Sheet

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

Role of each sheet

- Instruction: Explanation on background and how to fill in the sheet
- Revision: Record of revisions
- Definitions: Definitions of terminology
- <u>Declaration</u> Company Information (Q1-7 and A-G < <u>REQUIRED</u> >
- <u>Smelter List</u>: List of smelters (refiners) < WHERE NECESSARY*1>
- <u>Checker</u>: Checks whether all necessary information has been filled in
 - <CHECK REQUIRED#2 >
- <u>Product List</u>: List of target products < WHERE NECESSARY#3>
- Smelter Look-up: List of smelters (refiners)#4

(List of smelters (refiners) at the time of EMRT issuance)

Notes:

- #1 Fill in for minerals 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 EMRT issuance.
 - The latest list can be found on the RMI website.
 - * Please read "Instructions" and "Definitions" before filling in the form.



5. EMRT Rev.1.2 (2023 version): Changes

■ EMRT (Extended Minerals Reporting Template):

Oct. 20, 2021: Release of 1st version (Rev1.0)

May 12, 2023: Release of Revision (Rev.1.2)

Bug fix & update of Smelters' information in the Smelter Look-up Sheet of Rev.1.11

No revisions having impact on the practice of survey was made

★ Timing of release: Up to 2022, release was made in autumn. From 2023, release is made concurrently with the release of CMRT

EMRT entry guide (English version & Japanese version) is available on RMI's website

(E)https://www.responsiblemineralsinitiative.org/media/docs/EMRT%201.0%20Completion%20Guide Jun012022.pdf

 $\overline{(\mathsf{J})}$ https://www.responsiblemineralsinitiative.org/media/docs/EMRT%201.0%20Completion%20Guide Jun012022 JPN.pdf

Covered Minerals: Cobalt/Natural Mica *

• "Not applicable for this declaration" was added to the answer options of Q1, and it became possible to answer only for either cobalt or natural mica (necessary to confirm covered minerals beforehand with customers)

*There are 2 types of mica, natural mica and synthetic mica. Synthetic mica is not covered by this survey.

Natural mica: A mineral that is mined or naturally occurring, such as muscovite and phlogopite.

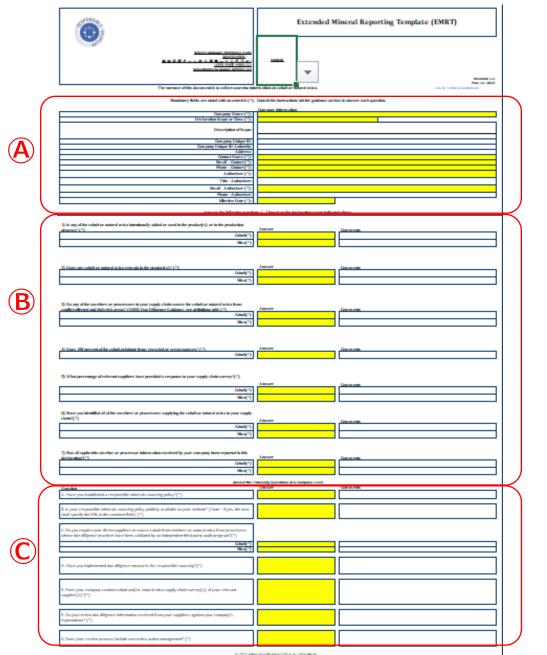
Synthetic mica (Fluorophlogopite): A man-made material composed of such materials as magnesium, aluminum, and silicon



6. How to complete the EMRT



6.1 How to Complete the EMRT: Declaration Sheet - Composition -



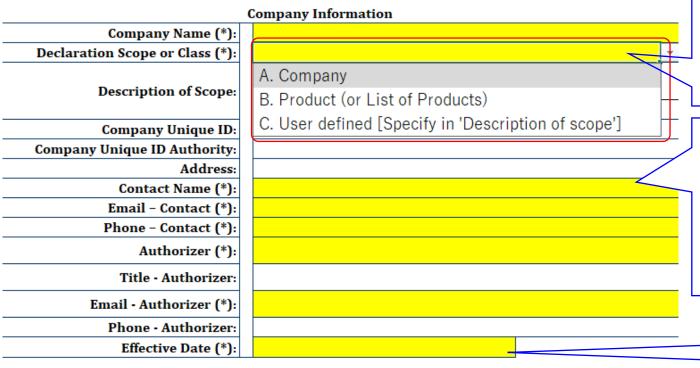
The Declaration Sheet is composed of three blocks

- A Questions related to your company's company information

 (14 questions)
- ® Questions related to the status of your cobalt/natural mica use (summary of primary supplier information)
 (7 questions)
- © Questions related to your
 Responsible Sourcing
 Procurement policies and actions
 (7 questions)

 Japan Electronics and Information Technology

6.1 How to Complete the EMRT: Declaration Sheet (A) Company Information



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

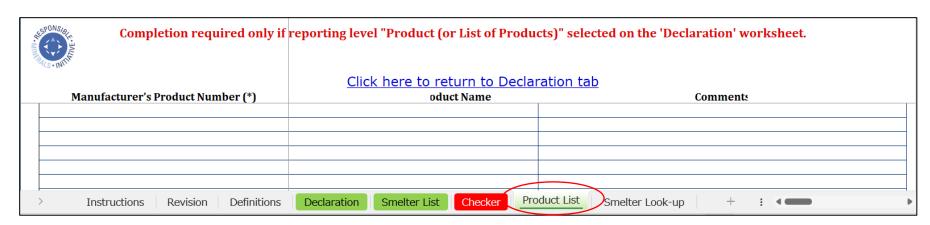
→ Specify the product scope in the "Description of Scope" field

6.1 How to Complete the EMRT: 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"

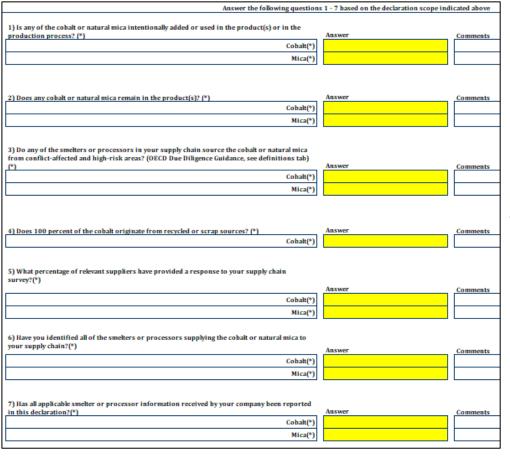
Company Information				
Company Name (*):				
Declaration Scope or Class (*):		B. Product (or List of Products)	-	
Go to Product List tab to enter products this declaration applies to				
		Click here to enter the products this declaration applies to		

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





Answer each question using the pulldown menu. If you answered "No" or "Not applicable for this declaration" to Q1, you don't need to respond from Q2 onward.



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



1) Is any of the cobalt or natural mica intentionally added or used in the product(s) or in the production process?

 Is any of the cobalt or natural mica intentionally added or used in the product(s) or in the 		
production process? (*)	Answer	
Cobalt(*)		Answer for each mineral
Mica(*)		Answer for each milleral

Yes: Answer "Yes" if cobalt or natural mica has been intentionally added or used because it is necessary to the functionality, specifications, or production of a product

No: Answer "No" if cobalt or natural mica has not been intentionally added or used, even if products include trace-level cobalt contaminants

Unknown: If you don't know whether cobalt or natural mica has been intentionally added or used, answer "Unknown"

Not applicable for this declaration: Select only if the use of cobalt or natural mica is not in scope of the declaration

(Necessary to confirm the covered minerals beforehand with customers, etc.)

- 1. If even one of the EMRTs you have collected from suppliers answers "Yes", your answer here must also be "Yes."
- 2. If all of the EMRTs you have collected from suppliers answer "No", your answer will be "No."
- 3. In cases other than the above, answer "Unknown."
- 4. If the use of cobalt or mica is not in scope of this declaration select "Not applicable for this declaration"

If you answered "Yes" to Q1, you are required to answer from Q2 onward.



2) Does any cobalt or natural mica remain in the product(s)?

2) Does any cobalt or natural mica remain in the product(s)? (*)	An	ıswer	
	Cobalt(*)		Anguar for each mineral
	Mica(*)	-	Answer for each mineral

Yes: If cobalt or natural mica remains in the product

No: If cobalt or natural mica does not remain in the product

Unknown: If you don't know whether cobalt or natural remains in the product

- 1. If even one of the suppliers from which you have received an EMRT answers "Yes, your answer here must also be "Yes."
- 2. If you answered "Yes", you must fill in the Smelter List Sheet.
- 3. If you answer "No" or "Unknown" no further answers are necessary from Q3 onward (option grayed out).

If cobalt or natural mica is added because it is necessary to the specifications or functionality, it will obviously remain in the product, so you should answer "Yes".

If cobalt or natural mica used in the production process remain in the product, the answer should be "Yes"

If you answered "Yes" to Q2, you must also answer Questions 3-7 and A-G.



3) Do any of the smelters in your supply chain source the cobalt or natural mica from a Conflict-Affected or High-Risk Area?

3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica	
from conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab) (*)	Answer
Cobalt(*)	
Mica(*)	

Answer for each mineral (Note: options are different for cobalt and mica)

Answer for Cobalt

Conflict-Affected or High-Risk Area: CAHRAs

Yes: If any of the smelters in your supply chain sources from a CAHRA (describe in Comments field)

No: If none of the smelters in your supply chain sources from a CAHRA

Unknown: If it is unclear whether smelters in your supply chain source from a CAHRA

DRC only: If your smelters source only from the DRC

※ If even one of the suppliers from which you have received an EMRT answers "Yes", your answer here must also be "Yes". If not all smelters are identifiable, that is, if your answer in Question 6 is "No", than your answer here must be "Unknown"

If there is a broad range of answers in the EMRTs you have collected, use the Comments field as shown on the right.

収集したEMRTの組合せケース				貴社EMRT回答(コバルト)		
Yes	No	Unknown		Answer	Comments	
0	0	0	0	Yes	including DRC	
0	0	0		Yes		
0	0		0	Yes	including DRC	
0		0	0	Yes	including DRC	
\bigcirc	0			Yes		
\bigcirc		0		Yes		
0			0	Yes	including DRC	
	0	0		Unknown		
	0		0	DRC only		
		0	0	DRC only	including unknown	
	0	0	0	DRC only	including unknown	

Comments: if comments "including DRC" or "including unknown" is stated in answers of any collected EMRT, please write such comments in the Comments field of your EMRT.



3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica from a Conflict-Affected or High-Risk Area?

3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica from conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab) (*)	Answer
Cobalt(*)	
Mica(*)	

Answer for each mineral (Note: options are different for cobalt and mica)

Answer for Mica

Conflict-Affected or High-Risk Area: CAHRAs

Yes: If any of the smelters in your supply chain sources from a CAHRA (describe in Comments field)

No: If none of the smelters in your supply chain sources from a CAHRA

Unknown: If it is unclear whether smelters in your supply chain source from a CAHRA

India and/or Madagascar only: If your smelters source only from India and/or Madagascar

※ If even one of the suppliers from which you have received an EMRT answers "Yes", your answer here must also be "Yes". If not all smelters are identifiable, that is, if your answer in Question 6 is "No", than your answer here must be "Unknown"

If there is a broad range of answers in the EMRTs you have collected, use the Comments field as shown on the right Comments: if comments "including India and/or Madagascar" or "including unknown" is stated in answers of any collected EMRT, please write such comments in the Comments fields of your EMRT.

	, , , ,		(= A			
収算	収集したEMRTの組合せケース			貴社EMRT回答(マイカ)		
Yes	No		India and/or Madagascar only	Answer	Comments	
0	0	0	0	Yes	including India and/or Madagascar	
\bigcirc	0	0		Yes		
0	0		0	Yes	including India and/or Madagascar	
0		0	0	Yes	including India and/or Madagascar	
\bigcirc	0			Yes		
\bigcirc		0		Yes		
0			0	Yes	including India and/or Madagascar	
	0	\circ		Unknown		
	0		0	India and/or Madagascar only		
		\circ	0	India and/or Madagascar only	including unknown	
	0	0	0	India and/or Madagascar only	including unknown	

3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica			Enter additional information in the Comments field
from conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab)			
_(*)	Answer	Comments	
Cobalt(*)			
Mica(*)			

[Common to Cobalt and Mica]

If you answer "Yes" or "DRC Only", 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 EMRT with a "Yes" or "DRC Only" answer to Question 3 with no substantiation in the Comments field, please ask for specific information to be added.



4) Does 100 percent of the cobalt originate from recycled or scrap sources?

4) Does 100 percent of the cobalt originate from recycled or scrap sources? (*)

Cobalt(*)

Answer

This question is for cobalt only

Yes: If 100% of the cobalt comes from recycled or scrap

sources

No: Some of the cobalt comes from natural (mined) resources

Unknown: Unclear whether 100% of the cobalt comes from

recycled or scrap sources

If all of the suppliers from which you have received an EMRT answer "Yes," your answer will be "Yes". If even one answers "No", your answer here must also be "No".



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

Cobalt(*)
Mica(*)
Answer

Answer

Answer

Answer for each mineral

Choose one of the following options according to the percentage of answers received from suppliers subject to the survey.

- 100%: Receive answer from all suppliers

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

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

W Unrelated to the contents of the answer to Question 5 received from suppliers Rate of answers received in your supplier survey = Number of answers received/Numbers of requests made

Suppliers excluded from the scope of this survey:

- Suppliers of equipment, tools, consumables, and other products outside the scope of this survey
- Suppliers or parts and materials which clearly do not contain cobalt/natural mica

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



6) Have you identified all of the smelters or processors supplying the cobalt or natural mica to your supply chain? (*)

6) Have you identified all of the smelters or processors supplying the cobalt of	or natural mica to	
your supply chain?(*)	Answer	
	Cobalt(*)	Answer for each mineral
	Mica(*)	

Yes: If you have identified all of these smelters/processors

No: If you have not identified even one of the smelters/processors supplying the

cobalt/natural mica to your supply chain

Unknown: If you don't know whether you have identified all such smelters/processors

You can only answer "Yes" if you meet all four of the conditions below:

- 1 You have received EMRTs from all the relevant suppliers (=your answer to Q5 was 100%)
- 2 The answer to Q5 in all the EMRTs you received was 100%
- 3 The answer to Q6 in all the EMRTs you received was "Yes"
- 4 The answer to Q7 in all the EMRTs you received was "Yes"

There are cases where all smelters were identified through the result of due diligence



6.1 How to Complete the EMRT: Declaration Sheet ® Cobalt/Mica Use Status

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

7) Has all applicable smelter or processor information received by your company been reported in							
this declaration?(*)	Answer						
Cobalt(*)			Answer for each mineral				
Mica(*)							

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

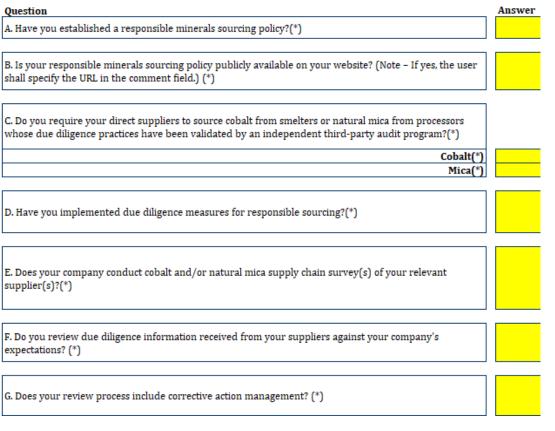
No: You have not reported some of the applicable smelter/processor information received by your company

Unknown: You don't know (You should not need to select this option.)

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 pulldown to answer each of the 7 questions on your company's policies and actions in relation to responsible minerals sourcing.



- A. Have you established a responsible minerals sourcing policy?
- B. Is your responsible minerals sourcing policy publicly available on your website? (Note: If "Yes", user shall specify the URL)
- C. Do you require your direct suppliers to source the cobalt from smelters or natural mica from processors 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 cobalt and/or natural mica 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?

Unrelated to the contents of EMRTs received from suppliers

If any of your answers to QA-G is limited to cobalt or mica, indicate the minerals to which it is related in the Comments field (e.g. "only implemented for cobalt", "only implemented for mica")

A. Have you established a responsible minerals sourcing policy?

Yes: If your company has established such a policy

No: If your company has NOT established such a policy

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 publicly available on your website



C. Do you require your direct suppliers to source the cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program?

Cobalt(*)

Mica(*)

Answer for each mineral

(Note: options are different for cobalt and mica)

Answer for Cobalt

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 RMI or an independent third-party audit program*

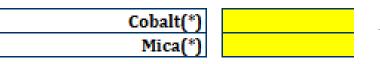
No: If you do not require this from, or clearly indicate this to, your direct (primary) suppliers

*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 EMRTs 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 RMAP conformant status.



C. Do you require your direct suppliers to source the cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program?



Answer for each mineral (Note: options are different for cobalt and mica)

Answer for Mica

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 RMI or an independent third-party audit program*

No: If you do not require this from, or clearly indicate this to, your direct (primary) suppliers Yes, when more processors are validated: If you plan to require this from your suppliers when more processors are validated.

*Independent third-party audit programs include the following: London Bullion Market Association (LBMA), Responsible Jewellery Council (RJC)

As mica processors that are RMAP conformant was 0 (as of June 2023), it is difficult to source from processors that are validated at present. If you plan to require your direct suppliers to source from validated natural mica processors when more processors are validated, select "Yes, when more processors are validated".



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 EMRTs received from suppliers
 - \Rightarrow e.g. Ranking the rates of receipt of EMRTs and the precision of smelter list information, etc.
- Creating and implementing strategies for dealing with identified risks
 - \Rightarrow e.g. Determining and implementing action rules based on the status of responses to Questions A-G.
- Prior written confirmation and agreement with suppliers on actions that will be taken when a connection with forced labor is identified.
 - We 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 cobalt and/or natural mica survey(s) of your relevant supplier(s)?(*)

Yes, in conformance with IPC1755 (e.g. EMRT): If you conduct conflict minerals surveys of your relevant suppliers using the EMRT format.

Yes, Using Other Format (Describe): If you conduct conflict minerals surveys of your relevant suppliers in a format other than the EMRT (describe such format in the Comments field)

No: If you do not collect due diligence information regarding cobalt and/or natural mica 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 EMRTs (due diligence information) received from suppliers

No: If you do not review EMRTs (due diligence information) received from suppliers

Review process examples:

- Review the accuracy and completeness of EMRT information received from Supplier
- Review whether suppliers have a responsible minerals sourcing policy, or review their actions based on their responses to Questions C-G
- 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

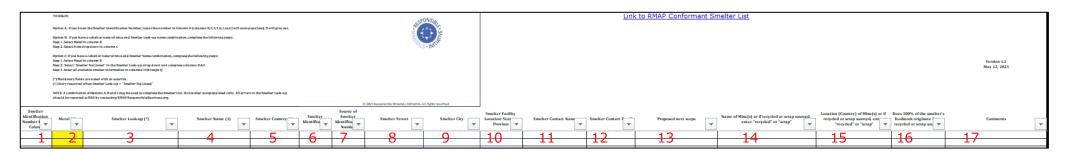
Examples of corrective action management:

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



6.2 How to Complete the EMRT: Smelter List Sheet - Structure -

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



- 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
- 3. Smelter Look-Up: a function by which you can find the Standard Smelter Name (SSN) from the Smelter Look Up sheet by entering the commonly recognized smelter name



6.2 How to Complete the EMRT: Smelter List Sheet – Preparation –

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

- ✓ List all the smelters that are listed in all EMRTs 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 EMRT issuance, and there are some cases where RMI has subsequently recognized a smelter as an SSN and given it a CID number (you can check this on the RMI website). Even in these cases, for the purposes of this EMRT, the smelter will be deemed "Smelter not listed".

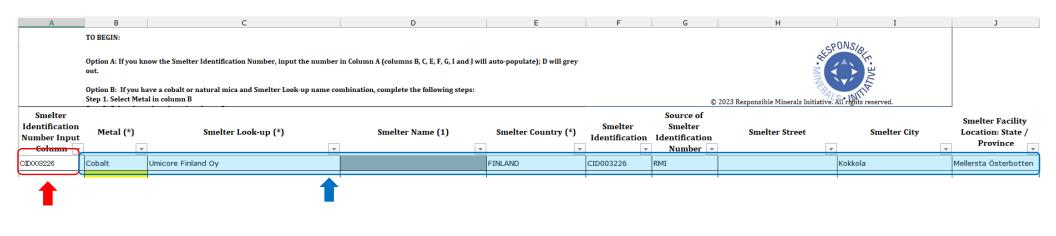


6.2 How to Complete the EMRT: Smelter List Sheet - Data Entry -

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.



Enter the CID number in Field A

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



6.2 How to Complete the EMRT: Smelter List Sheet - Data Entry -

2 If you don't know the CID number

If you select cobalt or mica 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 cobalt or mica 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 Cobalt or Mica in Field B and choose "Smelter not yet identified" in Field C.

А	В	С	D	E	F	G	н	I	J
	TO BEGIN:						. 0	ONe	
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. Option B: If you have a cobalt or natural mica and Smelter Look-up name combination, complete the following steps:									
Smelter Identification Number Input Column		Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
2	Cobalt	Cosmo EcoChem Co., Ltd.		KOREA, REPUBLIC OF	CID003415	RMI		Ulsan	- '
3	Cobalt	Smelter not listed	ABCDEF	JAPAN		Enter smelter details			
4	Cobalt	Smelter not yet identified							

6.3 How to Complete the EMRT: Product List Sheet - Data Entry -

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

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

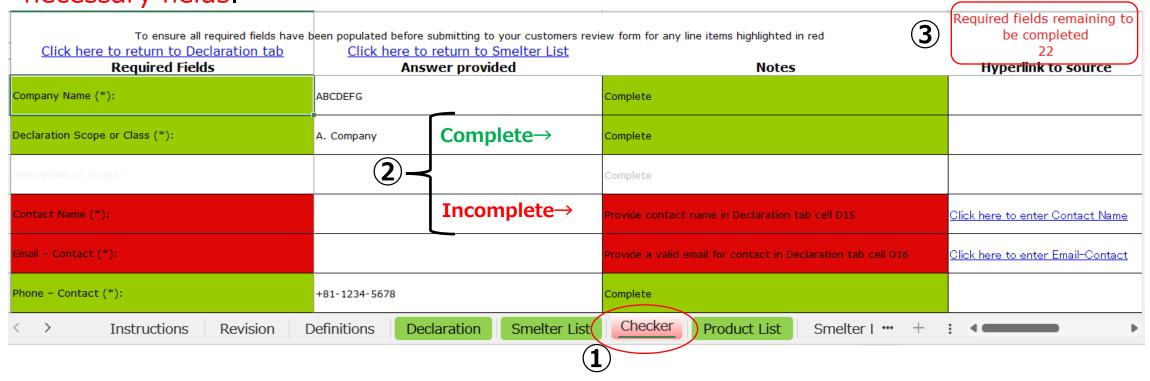
Manufacturer's Product Number (compulsory): Enter the product numbers for your relevant products

Manufacturer's Product Name: Enter the product name for your relevant products Comments: Enter comments where necessary



6.4 How to Complete the EMRT: Checker Sheet

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.



- 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





