

How to Complete a Conflict Minerals Reporting Template (CMRT)

CMRT Rev. 6.01

June 2020

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

【Notice】

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1. Conflict Minerals Survey: Background

What is the Conflict Minerals Survey?

This survey is a way to respond to the requirement since 2013 under the US Dodd-Frank Wall Street Reform and Consumer Protection Act 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, **T**in, **T**ungsten, **G**old

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

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 Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance Annex II Risks in regions defined as **Conflict-Affected Areas and High-Risk Areas (CAHRAs)**.^{*3}

^{*3} Covered countries as defined by the OECD (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 Risks:

1. Serious abuses associated with the extraction, transport or trade of minerals (child labour, etc.)
2. Direct or indirect support to non-state armed groups
3. Public or private security forces
4. Bribery and fraudulent representation of the origin of minerals
5. Money laundering
6. Payment of taxes, fees and royalties due to governments

*¹ Available to download from the OECD website

<http://www.oecd.org/corporate/mne/mining.htm>

1. Conflict Minerals Survey: CAHRAs

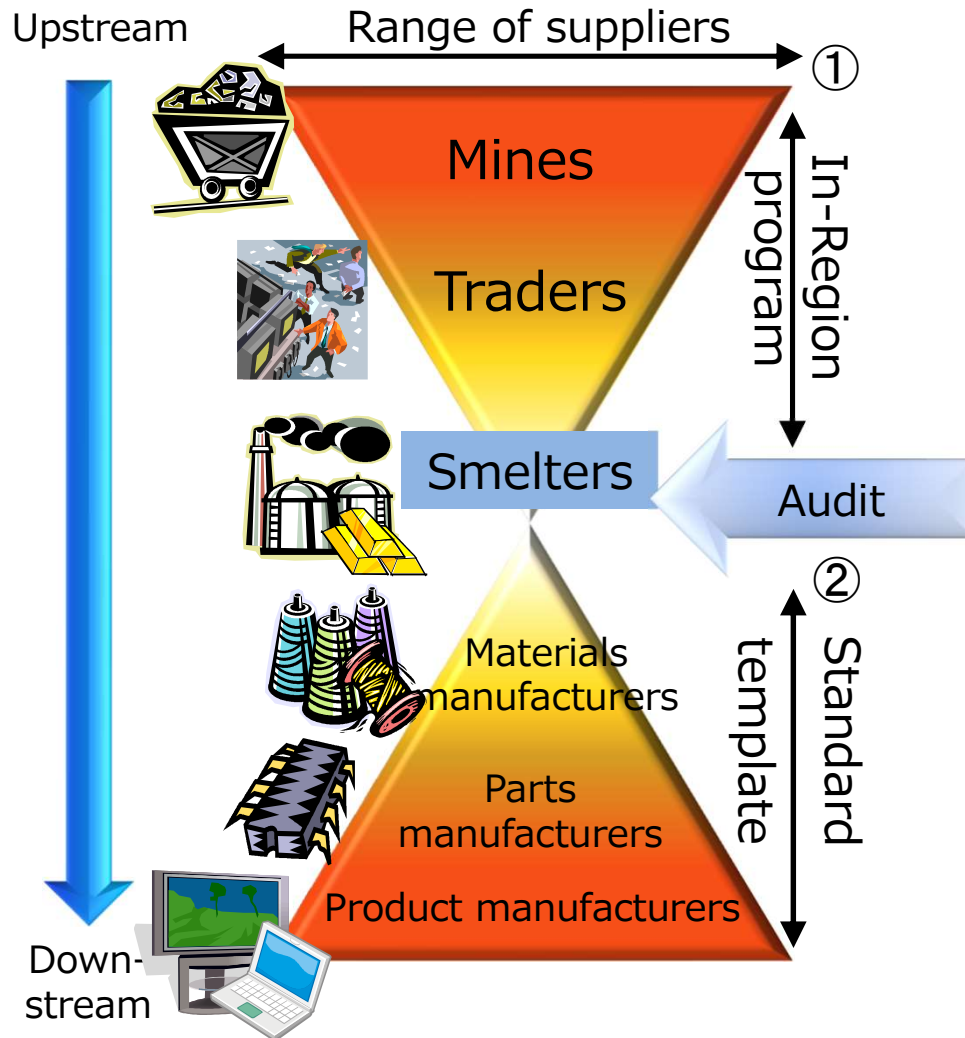
Conflict-Affected and High-Risk Areas (CAHRAs^{*1})

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

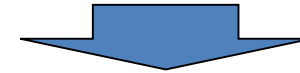
Note that the above definition is conceptual and that as of May 25, 2020, the EU had yet to identify specific regions as CAHRAs. According to the RMI^{*2} standard, however, the CAHRAs shall include, at a minimum, the Covered Countries under the Dodd Frank Act.

- *1 CAHRAs Conflict-Affected and High-Risk Areas
*2 RMI Responsible Minerals Initiative

1. Conflict Minerals Survey: CMRT Survey



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



RMAP Investigation

In the long supply chain hierarchy, the number of smelters is divided into two tiers to improve survey efficiency.

- From smelters upstream, smelters are audited through the **RMAP***1 program in the region to determine the origin of smelted minerals
- From smelters downstream, the **CMRT***2 is used to streamline surveys.

*1 **RMAP** Responsible Minerals Assurance Process

*2 **CMRT** Conflict Minerals Reporting Template (common format revised and reissued annually by the RMI)

1. Conflict Minerals Survey: Most Cases

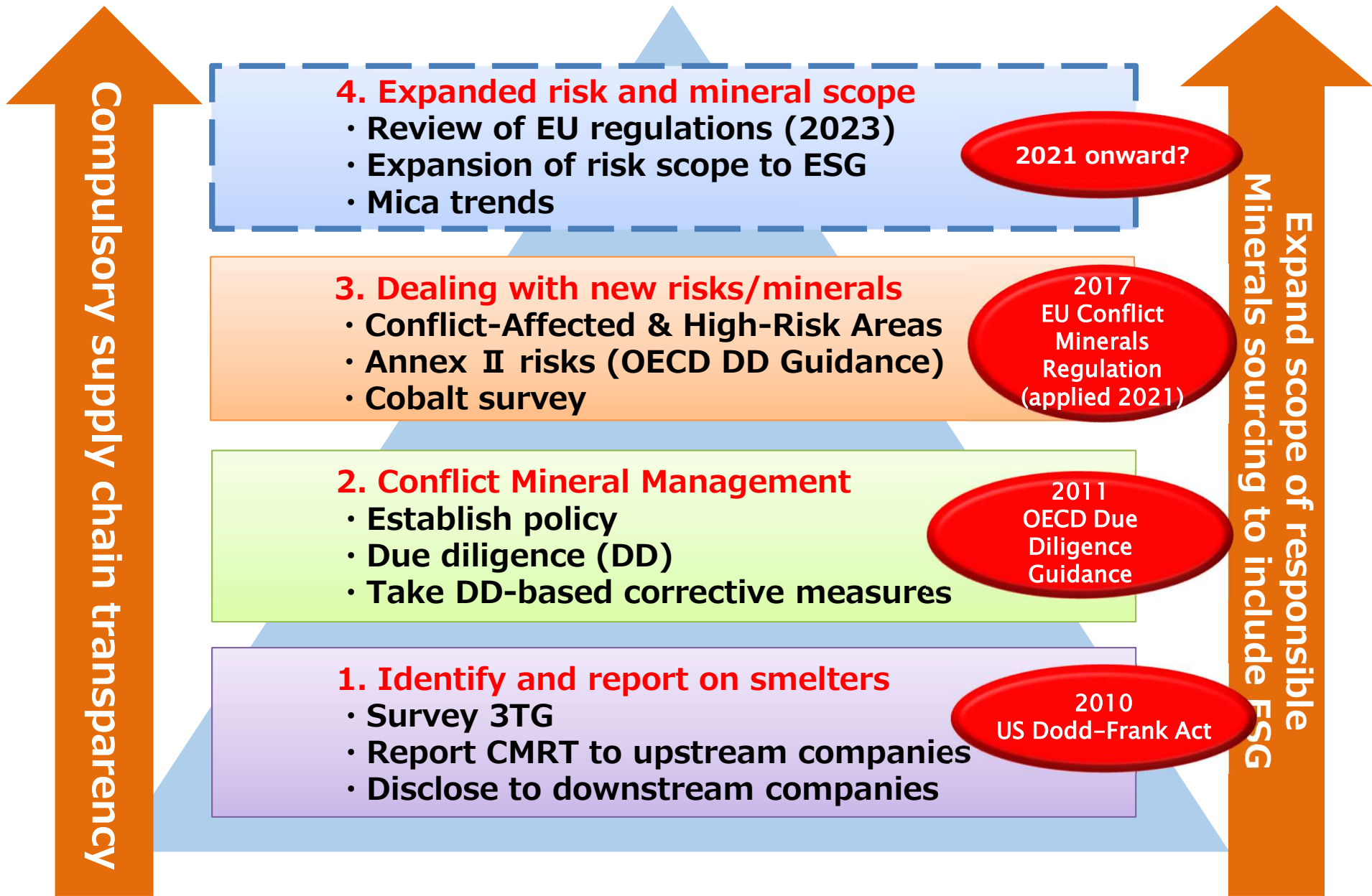
While US **unlisted companies** have no information disclosure obligation under the Dodd-Frank Act, their **customers** are requiring them to conduct conflict minerals surveys and report the results. Because modern supply chains stretch worldwide, manufacturers and many other companies are involved in 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 that if downstream companies are less responsive than importers, in its 2023 review, it will also make reporting compulsory for downstream companies, so care must be taken in this regard.

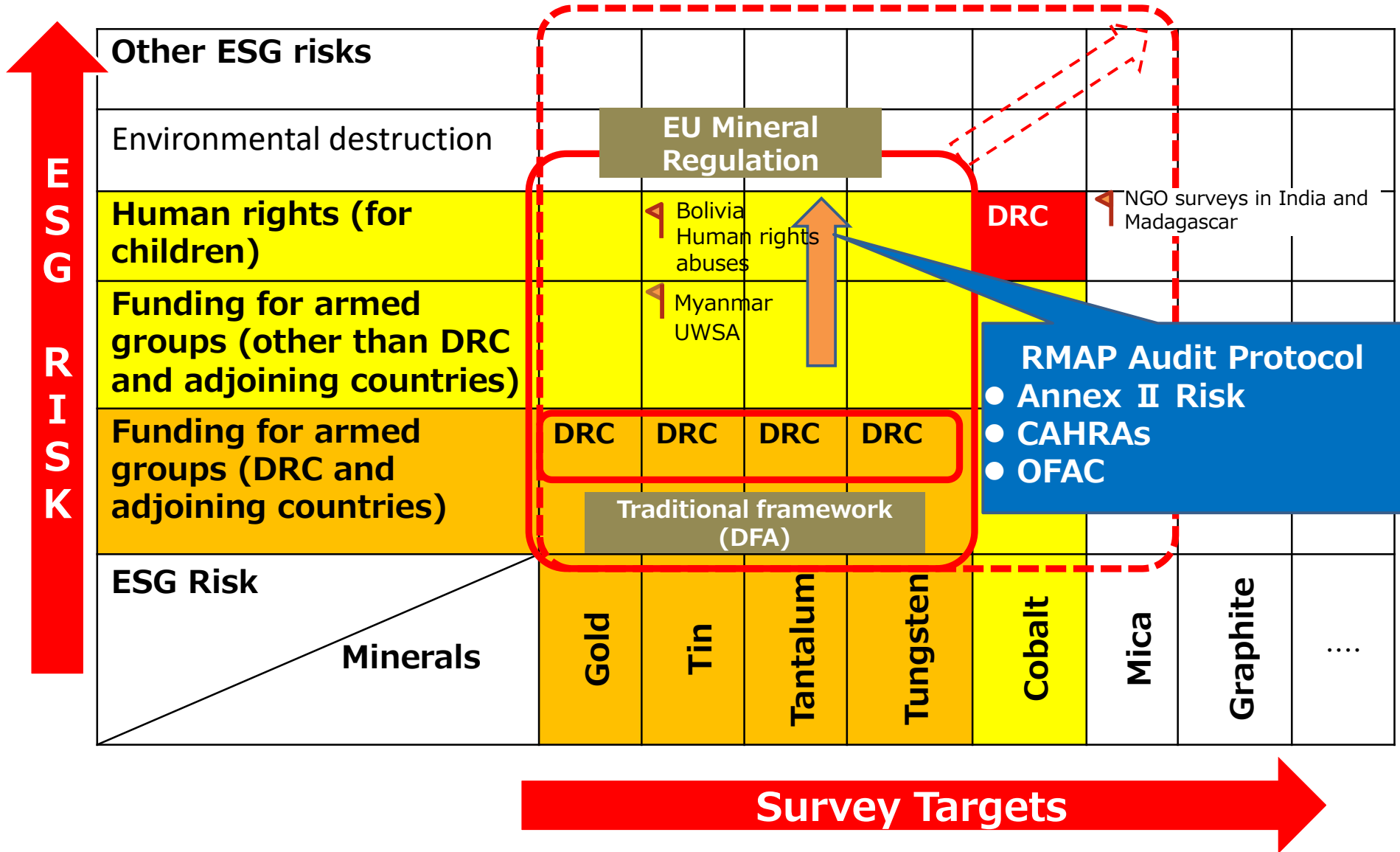
In addition, as of January 2019, the **RMAP audit protocol** has changed to the 2017 version of the standards for the minerals, risks and regions noted below. Smelters that cannot conform with these standards cannot acquire RMAP conformant status. If a smelter in your supply chain is no longer conformant,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

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

Accelerated initiatives toward responsible mineral sourcing



1. Conflict Minerals Survey: New Risks



1. Conflict Minerals Survey: RMI SSN Status

No. of **S**tandard **S**melter **N**ames (SSN) recognized by RMI as of 13 May 2020 and their conformance status (does not cover all smelters in the world)

Tantalum **Ta**

SSN total: 40 companies
 Conformant: 40 companies (**100%**)
 (No. of these conforming to new RMAP standards: 21)
 Active: 0

Tin **Sn**

SSN total: 92 companies
 Conformant: 78 companies (**85%**)
 (No. of these conforming to new RMAP standards: 15)
 Active: 1

Tungsten **W**

SSN total: 53 companies
 Conformant: 43 companies (**81%**)
 (No. of these conforming to new RMAP standards: 12)
 Active: 5

Gold **Au**

SSN total: 167 companies
 Conformant: 107 companies (**64%**)
 (No. of these conforming to new RMAP standards: 75)
 Active: 1

The new standards refer to the 2017 revisions to the RMAP standards, which have applied to all audits since January 2019 (3TG, OECD Annex II Risk, CAHRAs)

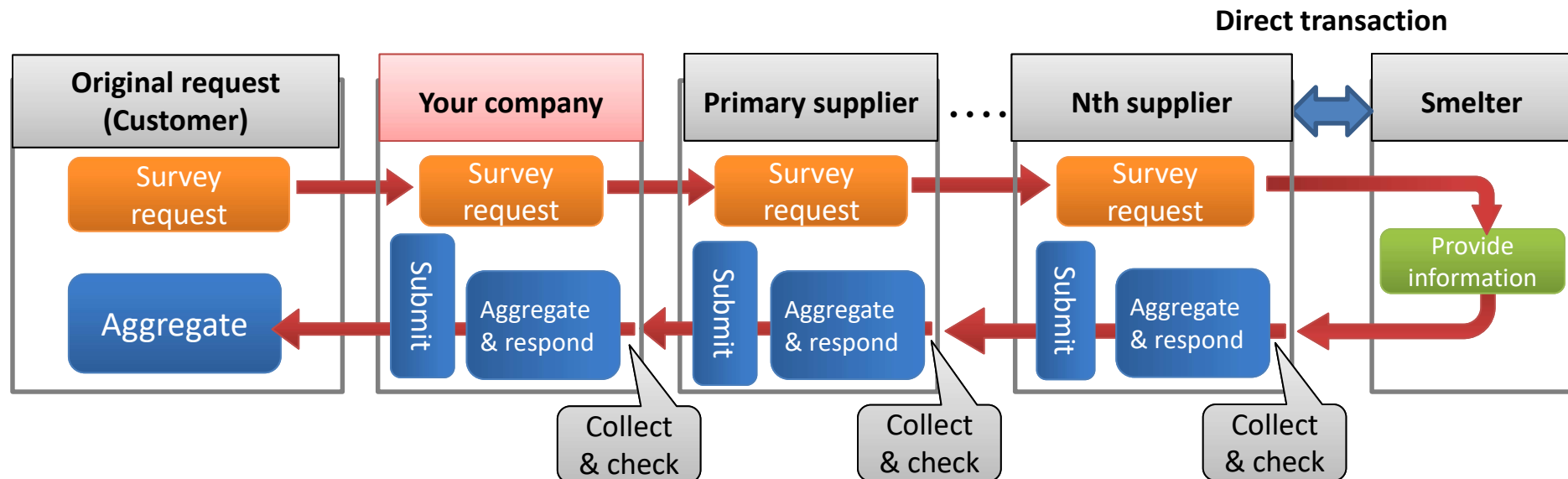
1. Conflict Minerals Survey: Survey Flow

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



2. CMRT Rev. 6.01 Outline: Structure

The CMRT comprises an 8-page Excel file:

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

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

[Link to Terms & Conditions](#)

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 (*):	

Navigation tabs: Revision | Instructions | Definitions | Declaration | Smelter List | Checker | Product List | Smelter Look-up

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

2. CMRT Rev. 6.01 Outline: Role of Each Sheet

Role of each sheet

- Revision Record of revisions
- Instructions Explanation of 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 the necessary information has been filled in <CHECK REQUIRED*²>
- Product List List of target products <WHERE NECESSARY*³>
- Smelter Look-up Smelter Look-up list*⁴
(List of smelters at the time of CMRT issuance)

Notes:

*¹ Fill in for those metals to which you responded “Yes” for Q2

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

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

*⁴ The latest list can be found on the RMI website.

* Please read the instructions and definitions before filling in the form.

2. Changes to CMRT Rev. 6.01

To comply with both the DFA and the EU Conflict Mineral Regulation, **Revision 6.01**^{*1} which was issued on 19 May 2020 features the following changes.

^{*1} Rev. 6.0 was initially issued on May 13, 2020 but revised immediately due to bugs.

Declaration: (Compared to Rev. 5.12)

- In the company information section, the phone number of “Authorizer” of the declaration information is now optional rather than mandatory.
- “Do any of the smelters in your supply chain **source the 3TG from conflict-affected and high-risk areas?**” added as Q4. (Subsequent numbers moved down one.)
- Question A has been changed to **“responsible minerals sourcing policy”**.
- The English text of Question B has been changed to “responsible minerals”.
- Question C (on whether you asked your primary supplier/s to ensure that minerals are DRC conflict-free) has been **removed**. (Subsequent letters moved up one.)
- Question E becomes D and becomes “due diligence measures for **responsible sourcing**”.
- Question I becomes H, “to SEC” has been deleted, and the options have been changed so that **SEC and EU** can be selected.

#2 Due Diligence (DD) = **risk assessment**

It refers to activities to make the supply chain transparent, check the origin of raw materials for the various types of risk noted earlier, check for violations, and correct any problems that are found. Checking and assessing CMRTs received from suppliers are also part of due diligence.

3. How to complete the CMRT:

3.1 Composition of the Declaration Sheet

The image shows a screenshot of the Conflict Minerals Reporting Template (CMRT) form. The form is titled 'Conflict Minerals Reporting Template (CMRT)' and includes the JEITA logo. It is divided into three main sections highlighted by red boxes and labeled A, B, and C:

- Section A:** This section is titled 'Company Information' and contains 14 items for reporting, including company name, address, and contact information.
- Section B:** This section is titled '3TG Use' and contains 8 questions related to the status of your 3TG use (summary of primary supplier information). The questions are:
 - 1) Is any 3TG intentionally added or used in the product(s) or in the production process?
 - 2) Does any 3TG occur in the production process?
 - 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 certified-attended and -audited smelters?
 - 5) Does 100 percent of the 3TG (necessary to the functionality of or production of your product) originate from recycled or scrap material?
 - 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) Have all applicable smelter certifications received by your company been reported in this declaration?
- Section C:** This section is titled 'Due Diligence' and contains 8 questions related to your responsible sourcing policies and actions. The questions are:
 - 1) Have you implemented responsible sourcing policies?
 - 2) Have you implemented due diligence procedures for responsible sourcing?
 - 3) Have your company conduct Conflict Minerals survey(s) of your relevant suppliers?
 - 4) Do your company due diligence and/or controls received from your suppliers align your company's requirements?
 - 5) Have your company process include corrective action management?
 - 6) Is your company required to file an annual conflict minerals disclosure?

The Declaration Sheet is composed of three blocks.

Ⓐ 14 company information items

Ⓑ 8 questions related to the status of your **3TG use** (summary of primary supplier information)

Ⓒ 8 questions related to your **responsible sourcing policies and actions**

3. How to complete the CMRT:

3.1 Declaration Sheet ① 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 pull-down 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.

DD-MMM-YYYY format
Example: 01-May-2020

- 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 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 ① 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, where you will fill in the manufacturer’s product number, etc. (details overleaf).

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

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Instructions | Definitions | Declaration | Smelter List | Checker | **Product List** | Smelter Look-up

3. How to complete the CMRT:

3.1 Declaration Sheet ③ 3TG Use Status

For each question, choose the pulldown for each 3TG to 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 - 8 based on the declaration scope indicated above		
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
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 (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)		
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? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum (*)		
Tin (*)		
Gold (*)		
Tungsten (*)		
8) Has all applicable smelter information received by your company been reported in this declaration? (*)	Answer	Comments
Tantalum (*)		
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? (new question)
- 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?

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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,” 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:

- Stannane used as a **catalyst** (in other words, tin)
- 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.

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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 as of Q3 (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. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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.”

※ Covered countries: DRC and the nine adjoining countries

Substantiate a “Yes” answer in the Comments section.

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 3 with no substantiation in the Comments section, 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		
Tin (*)	Yes		CID987654(DRC), CID111111(Rwanda)
Gold (*)	Yes		CID123456, CID000999
Tungsten (*)	Yes		

Examples

Must be completed

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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

- 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, at a minimum, the Covered Countries, so if you answered “Yes” to Question 3, you should also answer “Yes” here.
- No** If none of the smelters in your supply chain source from CAHRAs
- Unknown :** If it unclear whether they source from CAHRAs
(Until the EU releases a specific list of CAHRAs, unless the answer to Question 3 is “Yes,” it is considered reasonable to answer “Unknown” here.)

※ 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.”

※ CAHRAs: Conflict-Affected and High-Risk Areas

Substantiate a “Yes” answer in the Comments section.

For example, if you know the smelter name and CID number, this can be used to determine the smelter’s third-party certification status, and 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 section, please ask for specific information to be added.

3. How to complete the CMRT:

3.1 Declaration Sheet ㊦ 3TG Use Status

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.”
If they all answer “Yes,” your answer will be “Yes.”

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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 conflict mineral disclosures received from all direct suppliers.

- 100%
- Greater than 90%
- Greater than 75%
- Greater than 50%
- 50% or less
- None

※ Regardless of CMRT Question 6 answers 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%.

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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 supplier 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 cannot identify 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.

3. How to complete the CMRT:

3.1 Declaration Sheet ② 3TG Use Status

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 Question 8 answers to received from suppliers

The answer will usually be “Yes,” but it may be “No” if you have not reported all the applicable information because of an obligation to protect supplier confidentiality, etc.

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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

Question
A. Have you established a responsible minerals sourcing policy? (*)
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.) (*)
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? (*)

Question C from Rev. 5.12 has been deleted. Changes are marked in red.

Unrelated to disclosures received from suppliers

- 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 be DRC conflict-free? (@Rev.5.12)~~
- 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? (“with the SEC” deleted. Change option.)

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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)
- * Risks covered (OECD Annex II risk)
- * Regions covered (CAHRAs)
- * Response when a risk is identified

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.)

- 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 up on your website

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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.

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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 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 the origin of raw materials for the various types of risk noted earlier, check for violations, and correct any problems that are found.

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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 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

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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 (due diligence information) received from suppliers

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

Review process examples:

- Review the accuracy and completeness of supplier CMRTs.
- Review whether suppliers have a responsible minerals sourcing policy 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 is a risk, you should go back up the supply chain or use the Internet to check this.

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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 ask for 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.

3. How to complete the CMRT:

3.1 Declaration Sheet © Policies and Actions

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

3. How to complete the CMRT:

3.2 Smelter List Sheet –Structure–

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

The screenshot shows the 'Smelter List Sheet' form. It includes instructions for three options (A, B, and C) for entering smelter information. A logo for 'RESPONSIBLE MINING' is visible. The form is divided into two main sections. The right section has a link to 'RMAP Conformant Smelter List'. Below the instructions is a table with 17 columns, each with a dropdown menu and a red number. Column 2 is highlighted in yellow. The columns are: 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.

- 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. How to complete the CMRT:

3.2 Smelter List Sheet –Preparation–

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

- ✓ List all the smelters from which you have received CMRTs
- ✓ Use CID numbers, etc., to remove duplications (name identification)
- ✓ If your list contains non-SSN smelters without CID numbers, check on their website, etc., that 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 on the Smelter Look-up Sheet are as at the time of CMRT issuance, and there are some cases where the 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 CMRT, the smelter will be deemed “Smelter not listed.”

3. How to complete the CMRT: 3.2 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.

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>									
Smelter Identification Number In Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identificat	Source of Smelter Identificat Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
CID001200	tantalum	NPM Silmet AS		ESTONIA	CID001200	RMI		Sillamäe	Ida-Virumaa



Enter the CID number here



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

3. How to complete the CMRT:

3.2 Smelter List Sheet –Data Entry–

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 also copy and paste 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 the right SSN (CID number).

③ If there is no selection option 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 populate Fields H-P to the best of your ability.


④ If you cannot identify the smelter

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 In Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identificat	Source of Smelter Identificat Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
②	Tantalum	Asaka Riken Co., Ltd.		JAPAN	CID000092	RMI		Tamura	Fukushima
③	Gold	Smelter not listed	ABCDEF	CANADA		Enter smelter details			
④	Tin	Smelter not yet identified		Unknown					

3. How to complete the CMRT: 3.2 Smelter 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 Declaration tab		
Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments

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


Manufacturer's Product Name: Enter the product name

Comments: Enter comments where necessary

3. How to complete the CMRT:

3.4 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.

A 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 Required Fields	B Click here to return to Smelter List Answer provided	C Click here to return to Product List Notes	D ③ Required fields remaining to be completed 46 Hyperlink to source	O 
Company Name (*):	ABCDEF	Complete		
Declaration Scope or Class (*):	A. Company	Complete		
Description of Scope:	②	Complete		
Contact Name (*):		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		
Authorizer (*):		Provide authorized company representative contact name in Declaration tab cell D18	Click here to enter an Authorized Company Representative's name	

①

- 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.

4. RMI Website: Outline

- ◆ RMI Home Page

<http://www.responsiblemineralsinitiative.org/>

- ◆ Here you can access the following information (as at 13 May 2020)

- ① The **latest version of the CMRT**

- ② List of **SSNs** (Standard Smelter Names) and their conformance status

- a. Download all SSNs

- b. SSN revision history

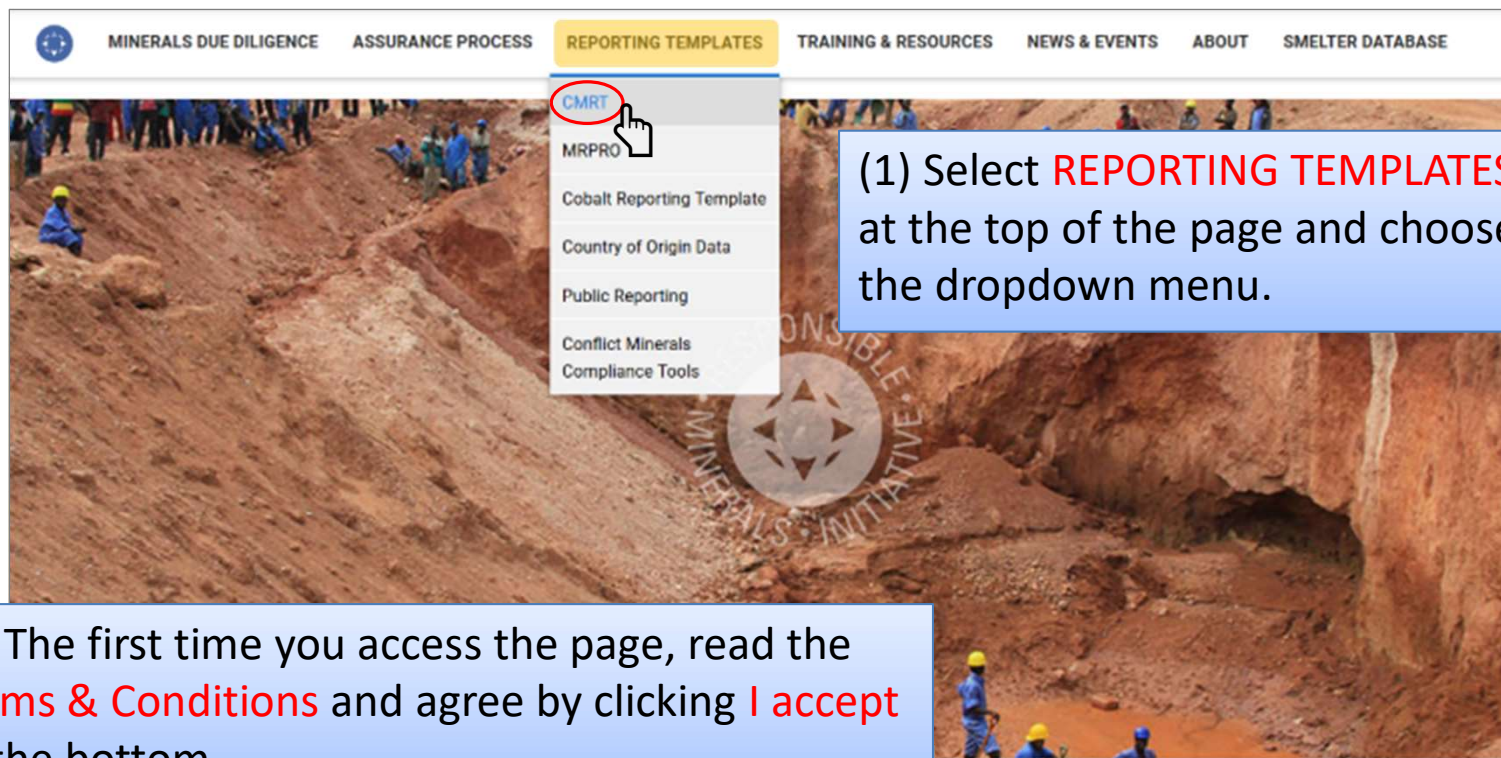
- c. Download only Conformant Smelters or Active Smelters

- d. Smelters covered under the Extended Corrective Action Plan (ECAP)

- e. Conformant Smelters conformance standards

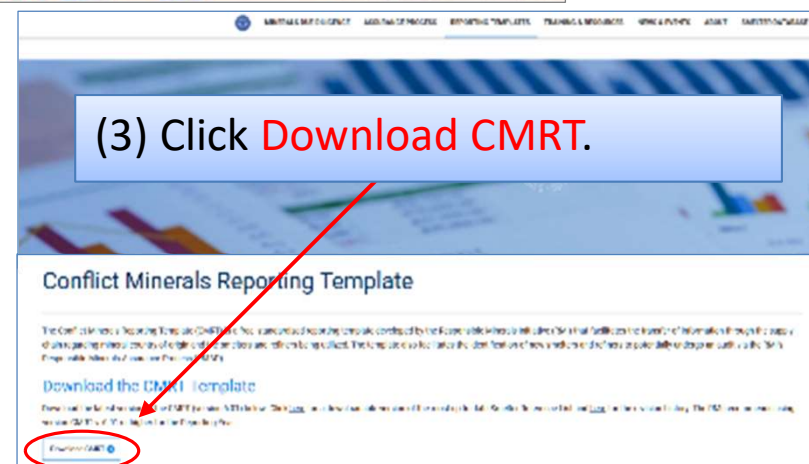
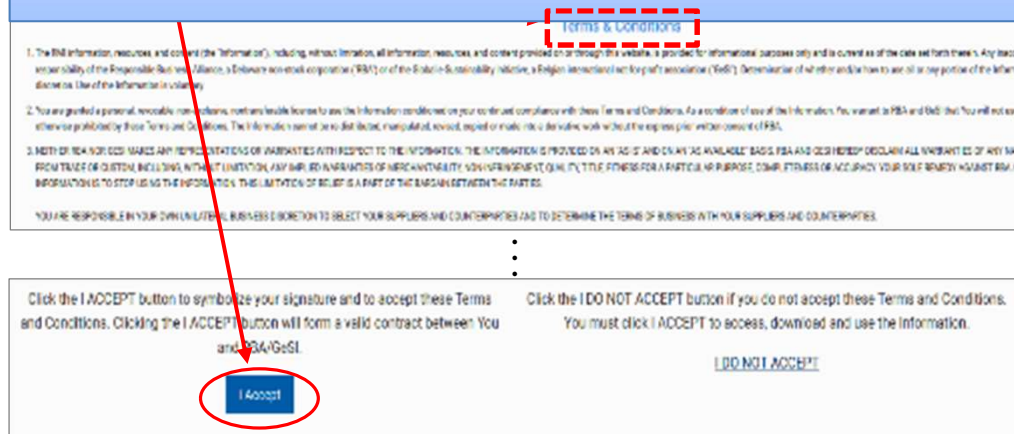
- ③ Meaning of **RMAP audit status** terminology

4. RMI Website: Outline

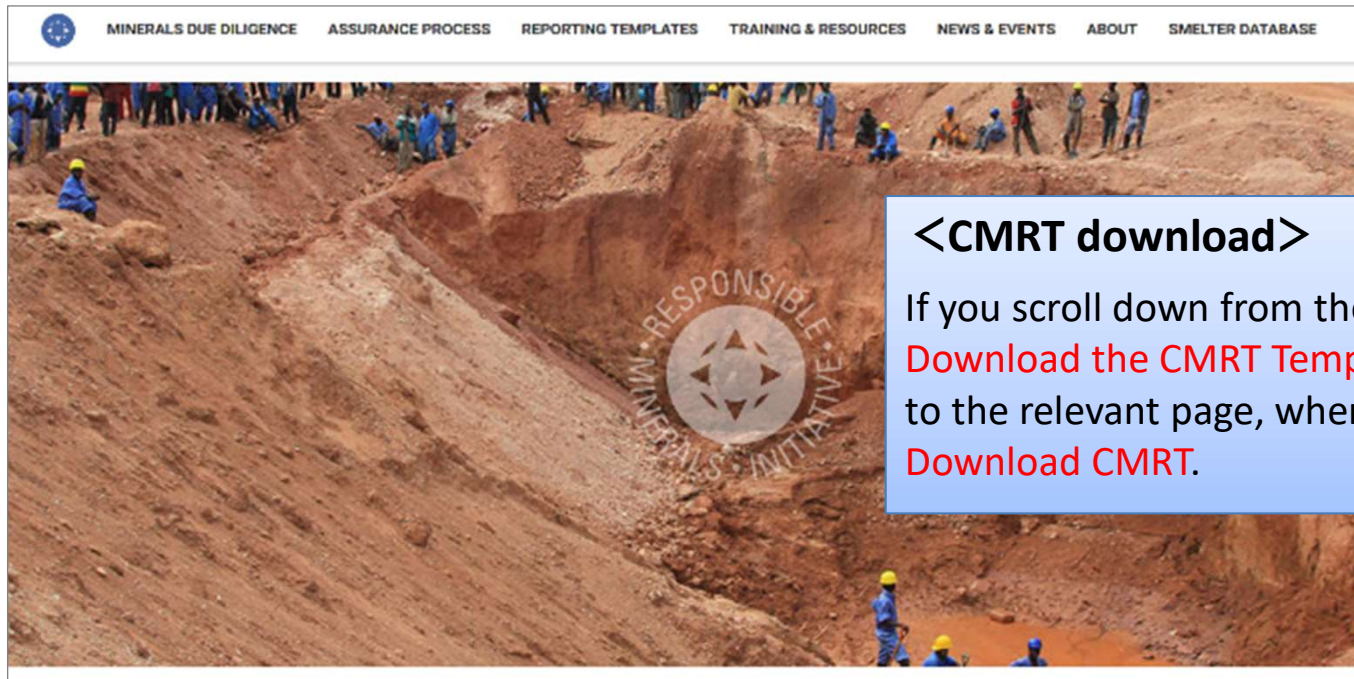


(1) Select **REPORTING TEMPLATES** from the tab at the top of the page and choose **CMRT** from the dropdown menu.

(2) The first time you access the page, read the **Terms & Conditions** and agree by clicking **I accept** at the bottom.



4. RMI Website: CMRT Template Download



<CMRT download>
 If you scroll down from the top **page** and click **Download the CMRT Template**, you will be taken to the relevant page, where you will click **Download CMRT**.

⋮ Scroll down

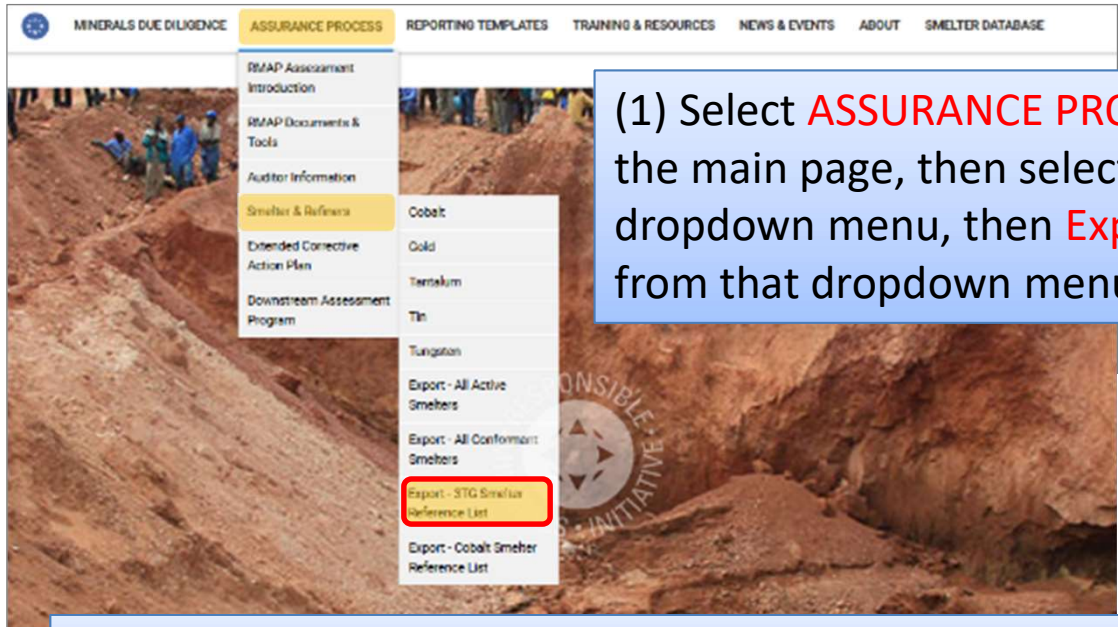
I want to...

- Learn about specific minerals ○
- Learn about the audit process ○
- Download the CMRT Template ○
- Identify my smelters or refiners ○
- Access training resources ○
- Become a member ○

4. RMI Website: SSN

② SSN list and revision history

②(a) Download all SSNs



(1) Select **ASSURANCE PROCESS** from the top menu on the main page, then select **Smelter & Refiners** from the dropdown menu, then **Export-3TG Smelter Reference List** from that dropdown menu.

(2) When 3TG Standard Smelter List comes up, click **Download Data**.

Export the Smelter Reference List for the CMRT

The following list represents the RMI's latest smelter name / alias information. The presence of a smelter here is NOT a guarantee that it is currently Active or Conformant with CMRT. Please refer to the RMI [active](#) and [conformant](#) lists for the most current and accurate list of standard smelter names that are Active or Conformant.

3TG Standard Smelter List

METAL	SMELTER REFERENCE	STANDARD SMELTER NAME	COUNTRY	SMELTER ID	CITY	STATE PROVINCE
Nickel	Nickel Kijana	Nickel Kijana	TANZANIA	01101100	Moshi	Lushoto
Gold	Abigone Refiner Metals, LLC	Abigone Refiner Metals, LLC	UNITED STATES OF AMERICA	01002700	Fairless Hills	Pennsylvania
Nickel	Nickel Dore Refiner Company	Nickel Dore Refiner Company	UNITED STATES OF AMERICA	01001010	Warwick	Rhode Island
Gold	African Gold Refinery	African Gold Refinery	UGANDA	01002100	Eraba	Wakiso

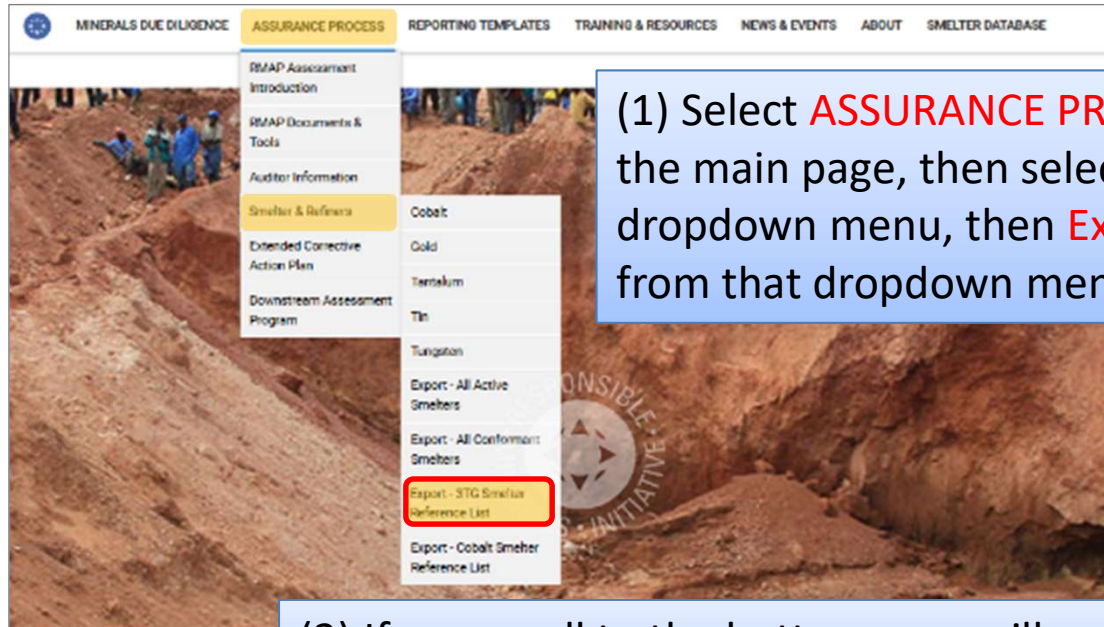
Download Data

The most recent SSN list will appear, but this does not specify whether smelters are conformant or active.

4. RMI Website: SSN

② SSN list and revisions history

② (b) SSN revisions history



(1) Select **ASSURANCE PROCESS** from the top menu on the main page, then select **Smelter & Refiners** from the dropdown menu, then **Export-3TG Smelter Reference List** from that dropdown menu.

(2) If you scroll to the bottom, you will see Revisions History. Click **Download Data**.

Revisions History

Please note that smelters/refiners previously removed from the Standard Smelter List may be added back once they come back into operation or meet the RMI standards' definition of a smelter again.

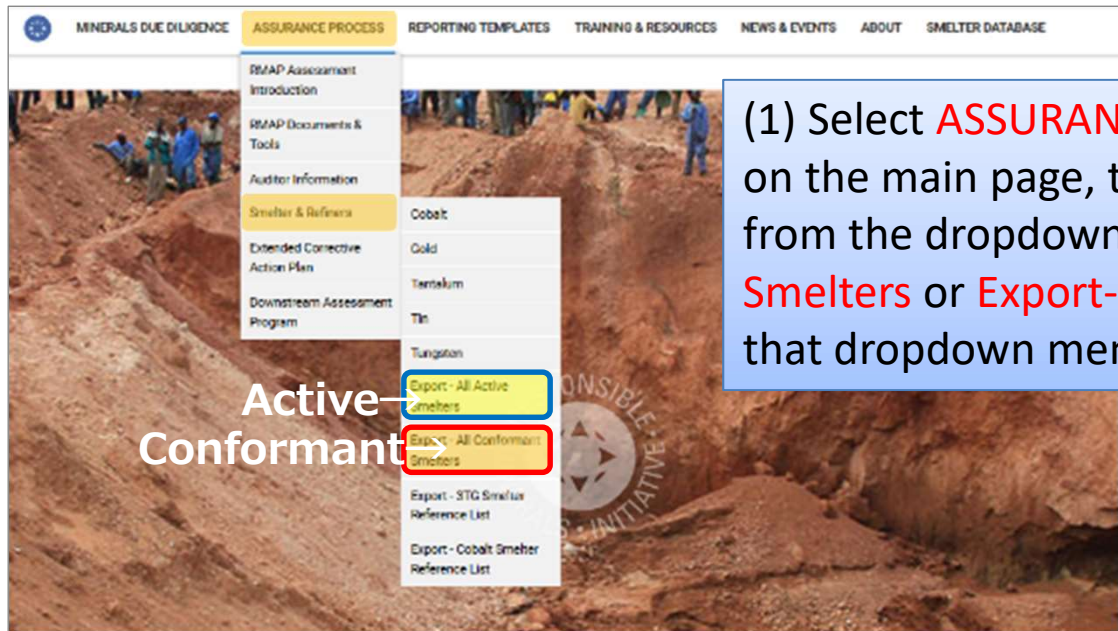
METAL	SMELTER ID	STANDARD SMELTER NAME	COUNTRY	BASIS FOR REVISION	DETAILS	REVISION DATE	SMELTER ADDED DATE
Cobalt	CID003225	Zhejiang Huayou Cobalt Company Limited	CHINA	Name correction	Name changed to reflect legal entity	2/11/2020	8/7/2018
Cobalt	CID003234	First Quantum Minerals Ltd.	AUSTRALIA	Name correction	Name changed to reflect legal entity	3/27/2019	11/6/2017
Cobalt	CID003255						
Cobalt	CID003338						

The revisions history shows the reason for the revision and the date for smelters whose status has been revised (deleted, amended, etc.) but not the date on which smelters were added to the SSN list.

4. RMI Website: SSN

② SSN list and revisions history

② (c) Download those SSNs which are Conformant Smelters or Active Smelters



(1) Select **ASSURANCE PROCESS** from the top menu on the main page, then select **Smelter & Refiners** from the dropdown menu, then **Export-All Active Smelters** or **Export-All Conformant Smelters** from that dropdown menu.

(2) When the smelter list you have chosen appears, click **Download Data**.

If you chose Conformant List →

Export All Conformant Smelters

ID	SSN	STANDARD OPERATOR NAME	OPERATION REGION	COUNTRY LOCATION	COMPLETION STATUS	LAST ALERT DATE	STATUS	REPORT BY	ISSUE BY	SIC
1	00000001	ABC S.A.	PRO. LORCA	ESP.	OK	2020/01/01	STAYING	STAYING		78
2	00000002	XYZ S.A.	Nigeria City, Nigeria	NIGERIA	OK	2020/01/01	STAYING	STAYING		

If you chose Active List →

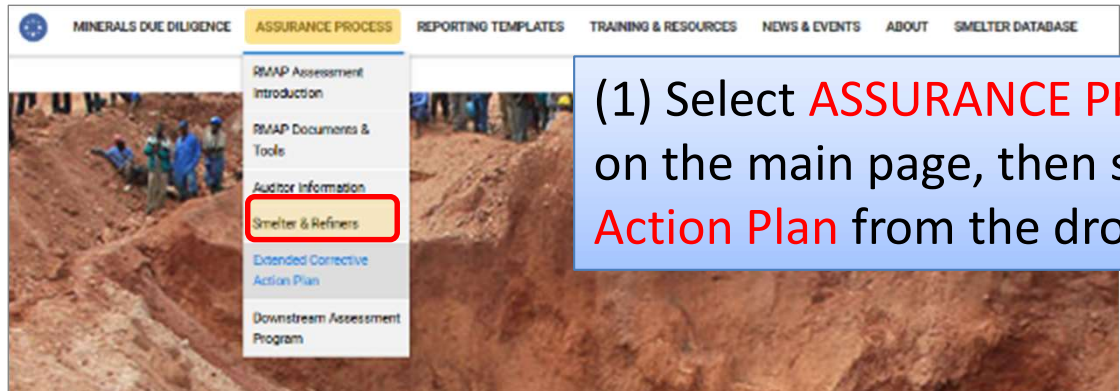
Export All Active Smelters

ID	SSN	STANDARD OPERATOR NAME	OPERATION REGION	COUNTRY LOCATION
1	00000001	ABC S.A.	PRO. LORCA	ESP.
2	00000002	XYZ S.A.	Nigeria City, Nigeria	NIGERIA

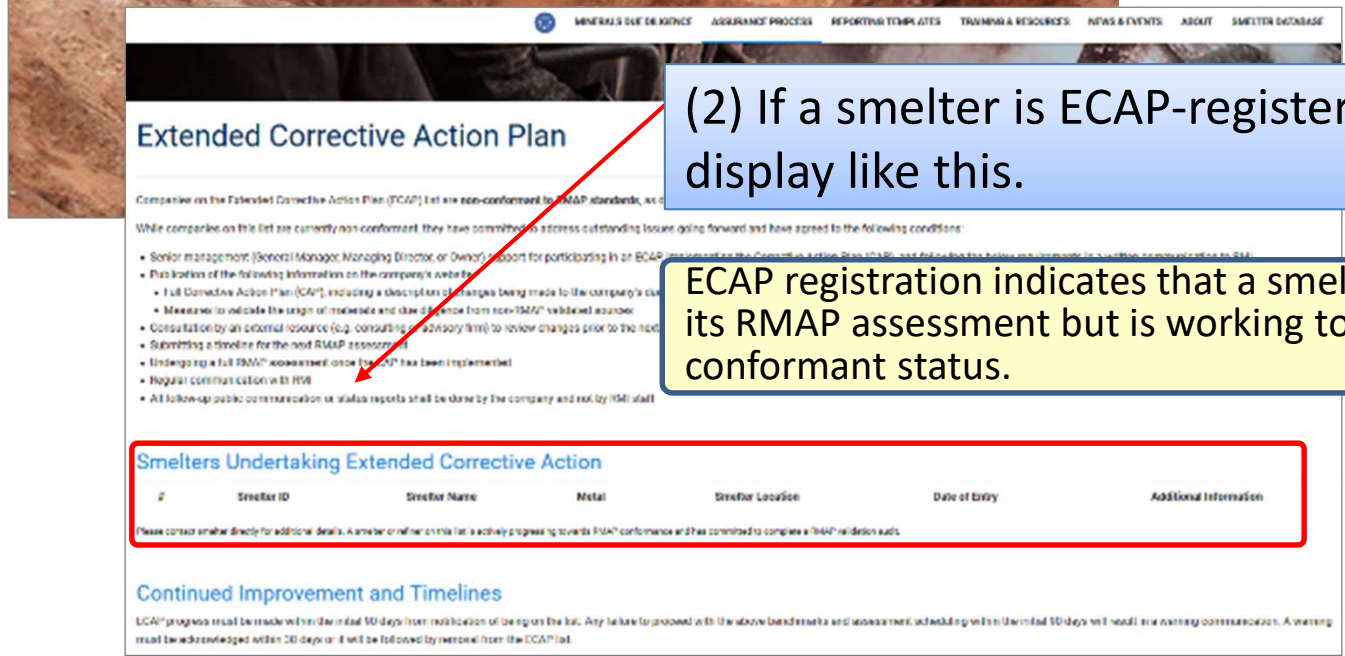
4. RMI Website: SSN

② SSN list and revisions history

② (d) Checking smelters registered for an Extended Corrective Action Plan (ECAP)



(1) Select **ASSURANCE PROCESS** from the top menu on the main page, then select **Extended Corrective Action Plan** from the dropdown menu.

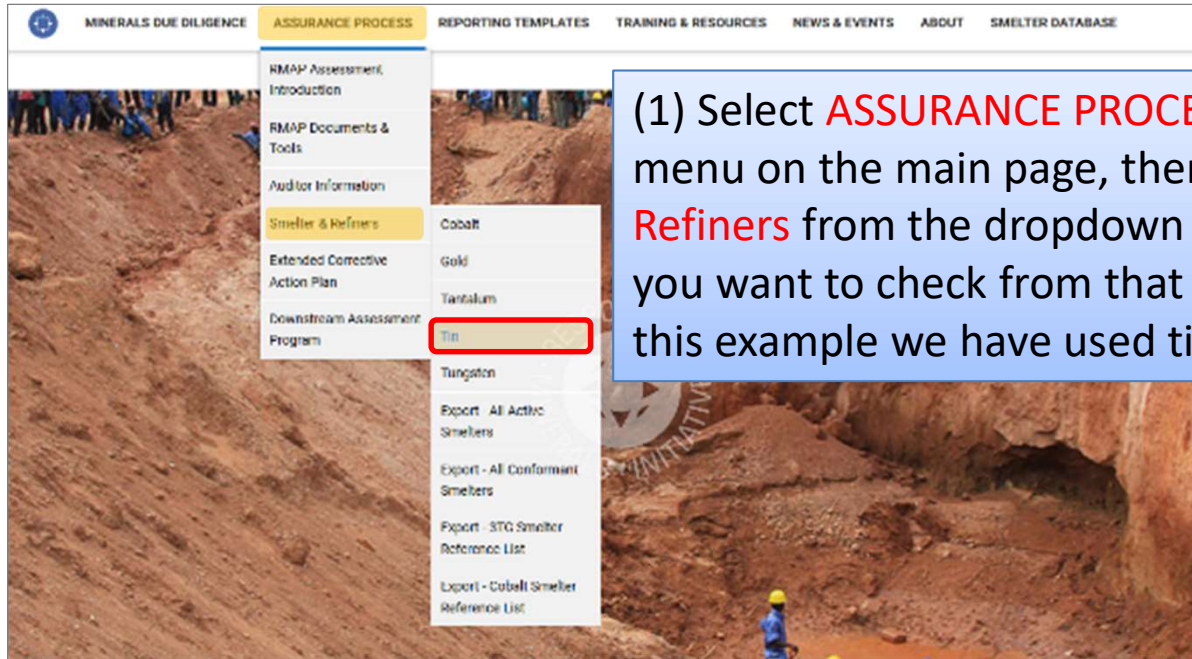


(2) If a smelter is ECAP-registered, it will display like this.

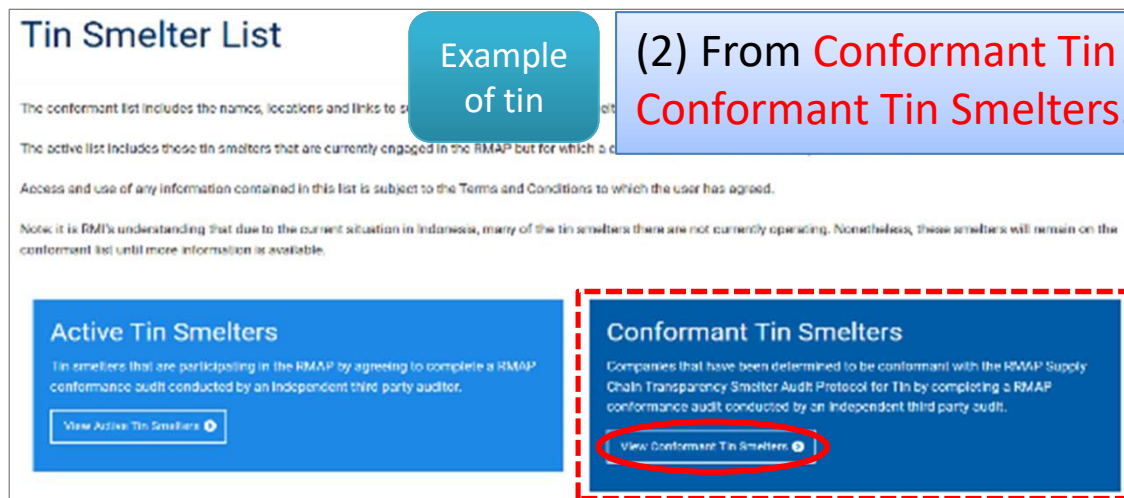
ECAP registration indicates that a smelter has failed its RMAP assessment but is working to regain conformant status.

4. RMI Website: RMI standards

② (e) How to check RMI standards for Conformant Smelters



(1) Select **ASSURANCE PROCESS** from the top menu on the main page, then select **Smelter & Refiners** from the dropdown menu and the metal you want to check from that dropdown menu. (In this example we have used tin.)



(2) From **Conformant Tin Smelters**, click **View Conformant Tin Smelters**.

4. RMI Website: RMI standards

(3) Choose from the list the smelter that you want to check and click **Link** to get to the **ASSESSMENT SUMMARY REPORT**.

Conformant Tin Smelters Example of Tin

SMELTER ID	STANDARD SMELTER NAME ▲	STATE/ PROVINCE/ REGION	COUNTRY LOCATION	SUPPLY CHAIN POLICY	DUE DILIGENCE REPORT	ASSESSMENT SUMMARY REPORT	LAST ASSESSMENT DATE
1	CID000292	Alpha	Altoona, Pennsylvania	UNITED STATES OF AMERICA	Link		5/7/2018
2	CID000228	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	Chenzhou, Hunan Sheng	CHINA	Link	Link	7/10/2018
3	CID003190	Chifeng Dajingzi Tin Industry Co., Ltd.	Chifeng, Nei Mongol Zizhiqu	CHINA	Link	Link	12/12/2018

✘ "Link" appears only for those smelters for which there is a report

(4) If you open the Link file, you can search **ASSESSMENT OBJECTIVES** to check the revision (year).

Example of 2017 standard

Assessment Period: 01/01/2018 – 12/31/2018

Assessment Company: Intertek

ii. **ASSESSMENT OBJECTIVES**

The objective of the assessment is to assess the auditee's level of conformance with the Responsible Minerals Assurance Process *TIN and TANTALUM* Standard of 2017.

The 2017 standard responds to OECD ANNEX II risks

Example of 2013 standard

Assessment Objectives

The objective of the assessment is to assess the auditee's level of conformance with the Responsible Minerals Assurance Process *TIN and TANTALUM* Standard of 2013.

Revision of 21 November 2013.

The 2013 standard responds to the DRC-related armed group risk

4. RMI Website: Terminology Explanation

③ RMAP status terminology

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

Status	Description
Conformant	Audited and found conformant with the relevant RMAP standard
ECAP	Extended Corrective Action Plan
Active	Engaged in the program but not yet conformant
In Communication	Not yet active but in communication with RMAP and/or member company
Outreach Required	Outreach needed by RMI member companies to contact entity and encourage their participation in RMAP audit
Non-Conformant	Audited but found not conformant with the relevant RMAP standard
Eligible	Meets the definition of a smelter/refiner; included in the CMRT Standard Smelter List
Not Applicable	Not eligible for the RMAP

Annex: Conflict Mineral Survey Abbreviations

Abbreviation	English
3TG	Tantalum, Tin, Tungsten, Gold
ASM	Artisanal and Small-scale Mining
CAHRAs	Conflict-Affected and High-Risk Areas
CCCMC	China Chamber of Commerce for Importers & Exporters for Minerals, Metals & Chemicals
CI	Cobalt Institute
CMRT	Conflict Minerals Reporting Template
CRT	Cobalt Reporting Template
DD	Due Diligence
DFA	Dodd–Frank Wall Street Reform and Consumer Protection Act
DRC	Democratic Republic of the Congo
ECAP	Extended Corrective Action Plan
GeSI	Global e-Sustainability Initiative
IPC	Association Connecting Electronics Industries
iTSCi	IRTI Tin Supply Chain Initiative
ITU	International Telecommunication Union
LBMA	London Bullion Market Association
LME	The London Metal Exchange
LSM	Large-Scale Mining
OECD	Organisation for Economic Co-operation and Development
OFAC	Office of Foreign Assets Control
RBA	Responsible Business Alliance (changed from EICC)
RCI	Responsible Cobalt Initiative
RCOI	Reasonable Country of Origin Inquiry