

Background of “Responsible Minerals Sourcing” and Administrative Work for the Survey

June 26, 2025

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

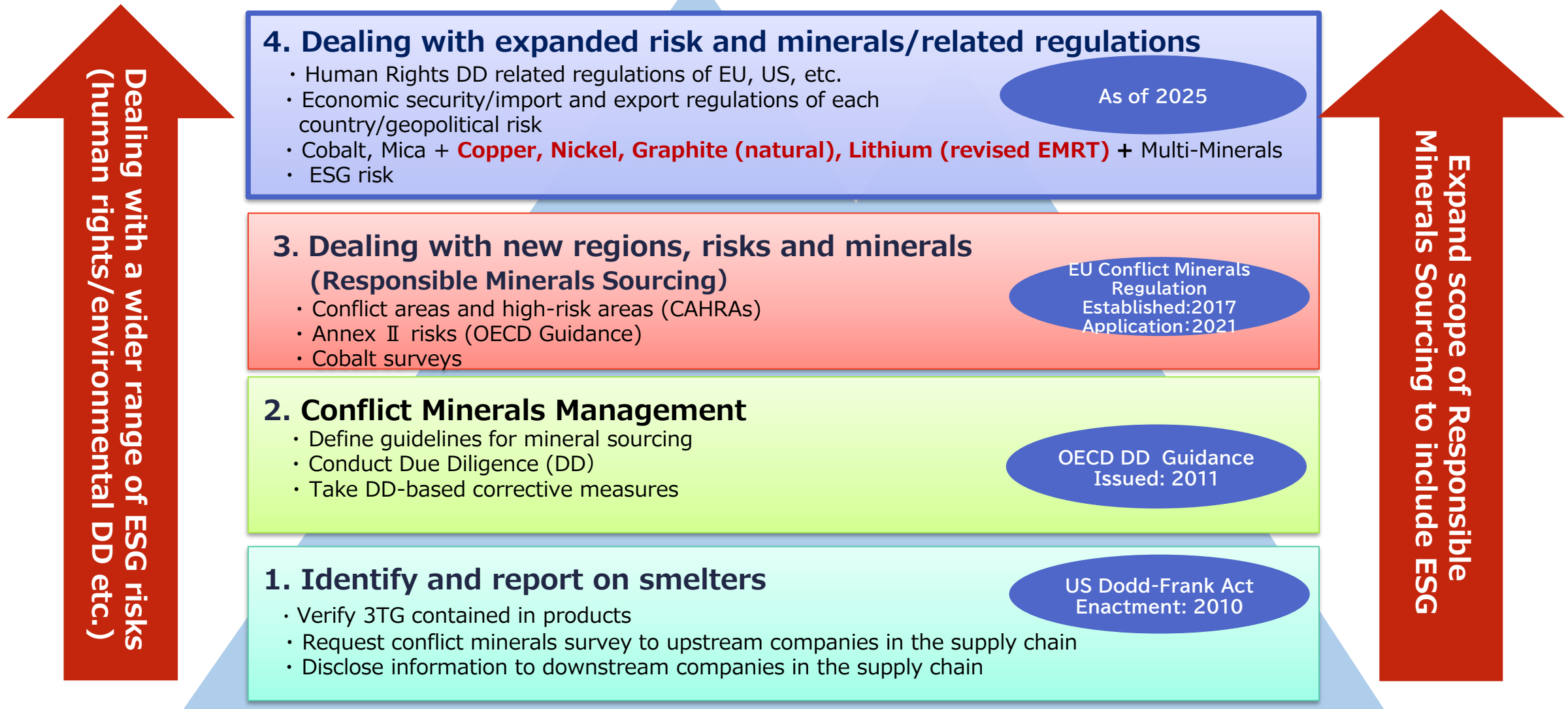
【Notice】

This document was created by the JEITA Responsible Minerals Trade Working Group.
We endeavour to ensure to provide a wide range of information regarding Responsible Minerals Sourcing which is as accurate as possible, but please be aware that it may not always be accurate or the latest information.

- Background and history of dealing with “Responsible Minerals Sourcing”
- Measures required in the future
- Conclusion (Summary)
- Reference Materials

- Background and history of dealing with “Responsible Minerals Sourcing”
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Changes in dealing with "Responsible Minerals Sourcing"



Broader and more complex approach is required in dealing with "Responsible Minerals Sourcing"

"Responsible Minerals Sourcing"

"From the perspective of sustainability/ESG, companies must endeavor not to use minerals implicated in human rights violations"

Scope of "Responsible Minerals Sourcing" required to companies

- ◆ Dealing with human rights and environment DD related regulations/economic security /import and export regulations/geopolitical risks etc.
- ◆ Dealing with multi minerals/the overall supply (value) chain/ESG risk

In the past ...

- ◆ **Scope of RMI's RMAP (Responsible Minerals Assurance Process)** 3TG+Cobalt+Mica/CAHRAs/OECD Guidance Annex II Risk
→ Moves to expand to all minerals auditing standard + worldwide (beyond CAHRAs)

Initially...

- ◆ Scope was based on US Dodd-Frank Act 3TG/DRC+9/involvement in conflict (funding sources for armed groups)

Scope covered by RMAP (CMRT/EMRT/AMRT)



Africa's history of conflict over minerals

Congo Conflicts

- **1st Congo War (1996-1997)**
Conflicts between ethnic groups (Hutu and Tutsi) started in Rwanda which led to the Rwanda genocide (victims: 500-800 thousand people). Huge number of refugees flowed into Congo.
- **2nd Congo War (1998-2003)**
A rebellion arose against the Kabila administration established after the 1st Congo War. Rwanda and Uganda supported the anti-government armed group.

Congo Conflicts
estimated
number of
death※

6 million

※Including indirect casualties such as from
starvation and disease

Serious humanitarian risks (e.g. sexual violence and human rights violation) by armed groups are not only continuing but recently such groups are intensifying their activities



Refugees said to be over
1 million people



Child soldiers in armed groups

(Ref) To enhance understanding of the
background of Congo War

Dr. Denis Mukwege:

Is an obstetrician and social activist in DRC. He founded Panzi Hospital in Bukavu, South Kivu, in the eastern part of DRC, has treated 30 thousand women that were victims of rape in the aftermath of the 2nd Congo War and also provides mental care for such women. In 2018, he won the Nobel Peace Prize.



Ref: Movie "The Man Who Mends Women" United People)

US Financial Regulatory Reform Act (Dodd-Frank Act)

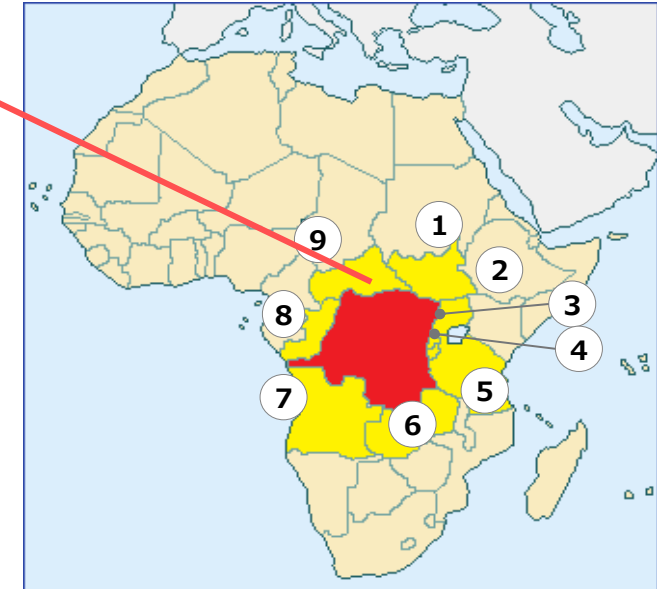
- In the **Democratic Republic of the Congo (DRC)** and **nine neighboring countries**, the human rights violations and environmental destruction, etc. caused by armed groups funded by illegally mined mineral resources became an international problem.
- In July 2010, Article 1502 was consequently added to the US Financial Regulatory Reform Act (the "Dodd-Frank Act").

- ① **Tantalum, tin, tungsten, gold (3TGs)** was defined as conflict minerals
- ② US listed companies subject to the Act were required to investigate whether conflict minerals used in its own products **manufactured (or commissioned) during Jan.-Dec. every year** are providing funding to armed groups in such areas and **disclose this by the end of May of each following year**.

- The final implementation rules were adopted in August 2012, **and conflict minerals surveys began in earnest in 2013.**

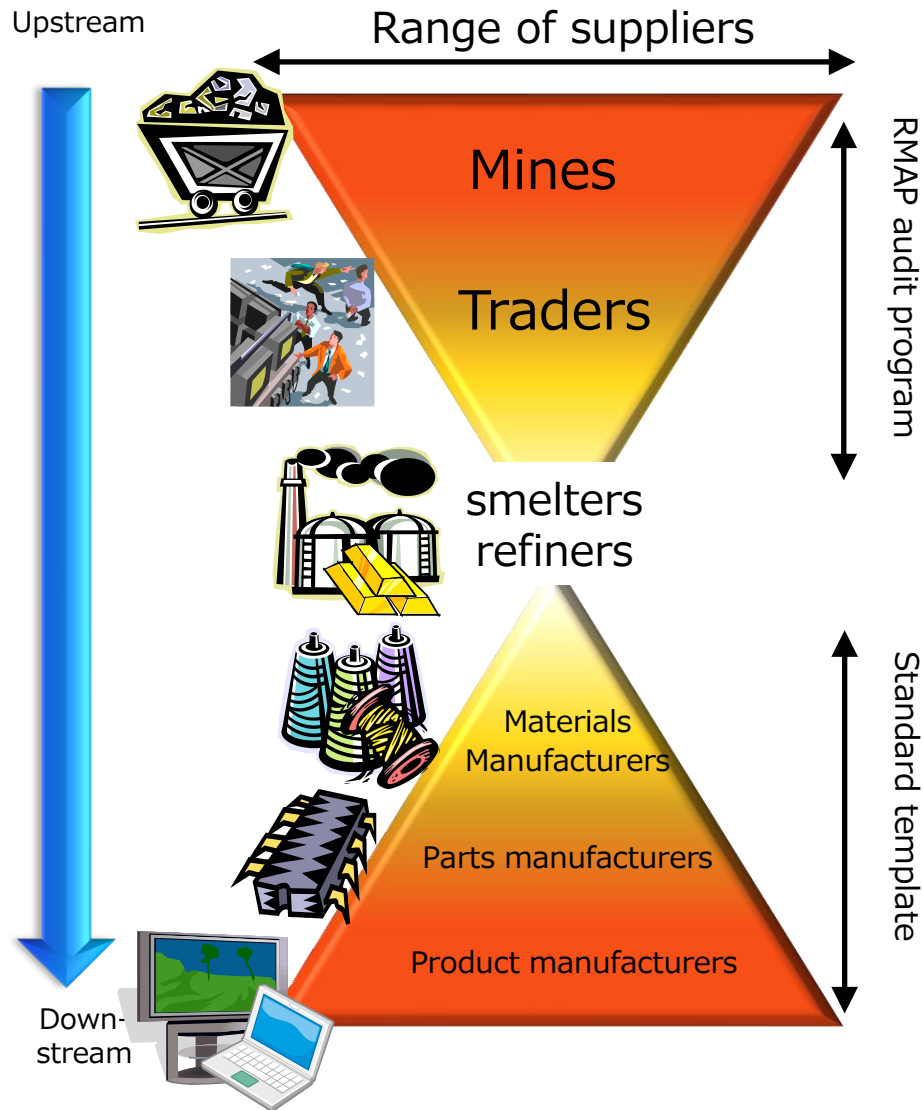
DRC

- ① South Sudan
- ② Uganda
- ③ Rwanda
- ④ Burundi
- ⑤ Tanzania
- ⑥ Zambia
- ⑦ Angola
- ⑧ Congo
- ⑨ Central Africa

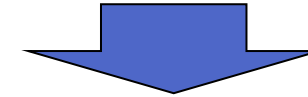


- The Act that led to the start of conflict minerals survey
- 10 years have passed since surveys started in earnest, and is still in force. There are some discussions on revision, but there is no change in its requirement at this point.
- Attention should also be paid to the US government's activities that have impact on companies' procurement activities, such as the Uyghur Forced Labor Prevention Act, OFAC Regulations, etc.

Responsible Minerals Assurance Process (RMAP)



- Involves huge cost and time for companies to do their own audit of 3TGs origin



RMAP Investigation

To improve survey efficiency, the long supply chain hierarchy is divided in 2 tiers, with smelters in the middle, as the number of smelters are relatively small.

- From smelters upstream: Smelters are audited through the RMAP program in the region to determine the origin of smelted minerals
- From smelters downstream: CMRT is used to streamline surveys

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

Survey on cobalt/mica is basically made by the same method, and downstream companies' role are to identify smelters/refiners (processors)

RMAP (Responsible Minerals Assurance Process)
CMRT (Conflict Minerals Reporting Template)

EU Conflict Minerals Regulation (compared to US DFA)

	US Dodd-Frank Act (DFA)	EU Conflict Minerals Regulation
Effective Date	July 2010 Establishment Aug. 2012 SEC finalized rules pursuant to DFA	July 2017 Effective Jan. 2021 Fully applicable (DD obligations)
Target	US listed manufacturers	Importers of minerals to EU (mineral ore/ unprocessed metal) * Excluding parts and product importers
Risks	Based on whether such mineral funds armed groups	Based on OECD Due Diligence Guidance ANNEX II (Human rights violations, including child labor)
Minerals	Tin, tantalum, tungsten, gold	Tin, tantalum, tungsten, gold
Areas	DRC + surrounding 9 countries	Conflict Affected and High Risk Areas (CAHRAs)
To do	1. Survey on 3TG use, country of origin 2. Supply chain DD 3. Submit annual report	1. Supply chain DD 2. Submit annual report 3. Ex post factor review by EU member nations

- The 1st review report of EU Conflict Minerals Regulation was released in Sept. 2024
- There were no significant effect of the Regulation in the 1st review as it was still in the early stage of the operation, and no revision was made.
- Next review is scheduled in 2026
- Revision may be made to conform with other EU supply chain DD regulations (proposal)

OECD Due Diligence Guidance

“Due Diligence Guidance for Responsible Supply Chains of Minerals from OECD Conflict-Affected and High-Risk Areas”

3rd Edition tentative translation: <https://www.mofa.go.jp/mofaj/files/100057444.pdf> (MOFA website)

Guidance with the objective to help companies respect human rights, comply with regulations of international humanitarian law applied in the armed conflict, avoid contributing to conflict, cultivate transparent mineral supply chains and sustainable corporate engagement in the mineral sector. Provides the Five-Step Framework for Due Diligence.



Covered risks (Annex II Risk), covered areas (CHARA), etc. in the EU Conflict Minerals Regulation is specified based on this guidance, exceeding the framework of US Dodd-Frank Act. Many other due diligence regulations also refer to this guidance.

Risks and Areas in OECD Guidance

“Risk of Conflicts in DRC & surrounding countries → “OECD Annex II Risks in CAHRAs”

1. Serious abuses associated with the extraction, transport or trade of minerals (forced labor, 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)

Survey of conflict minerals
Original covered risk

Definition of Conflict-Affected High-Risk Areas(CAHRAs)

(Definition in the EU Conflict Minerals Regulation is basically the same)

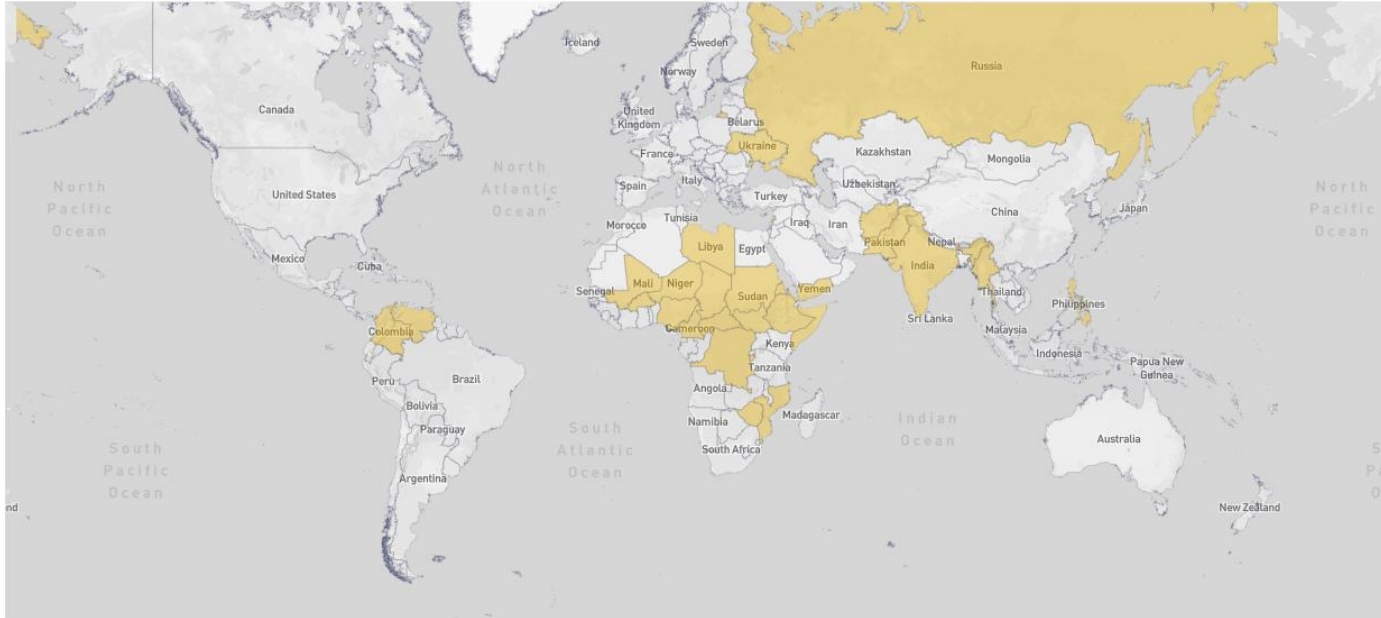
Conflict-Affected High-Risk Areas (CAHRAs) are identified by the presence of armed conflict, widespread violence or other risks of harm to people.

Armed Conflict can take many forms, including international or non-international conflict. It can involve two or more countries, or it can be a war of liberation, a rebellion, or a civil war.

High-Risk Areas include areas with political instability, oppression, institutional shortcomings, and instability, areas where domestic infrastructure has collapsed, and areas where violence is widespread. There are widespread human rights abuses and violations of national or international law in these areas.

Conflict-Affected High-Risk Areas(CAHRAs)

CAHRA List released by EU based on EU Conflict Minerals Regulation <https://www.cahraslist.net/>



<Overview of EU CAHRAs List>

Institution commissioned by EC: Rand Europe

Release date of 1st version: December 17, 2020 (revised every 3 months)






Release date of current version: Revised on March 2025 (major changes are stated in the Release Note of the above website)

Next update scheduled at the end of June 2025

Contents of List: **236 areas from 28 countries. (Russia and Lebanon has been added since last year's seminar)**

Individual risk report by countries and areas are also released.

Smelters and importers undergoing RMI assessment should determine its risk based on various information sources (including this list)

BURUNDI	
REGION(S)	Bubanza, Bujumbura Mairie, Bujumbura Rural, Bururi, Cankuzo, Cibitoke, Gitega, Karuzi, Kayanza, Kirundo, Makamba, Muramvya, Muyinga, Mwaro, Ngozi, Rutana, Ruyigi
AREA STATUS	 Conflict-affected area
RELEVANT COMMODITIES	 Gold
	 Tin
	 Tantalum and Niobium
	 Tungsten

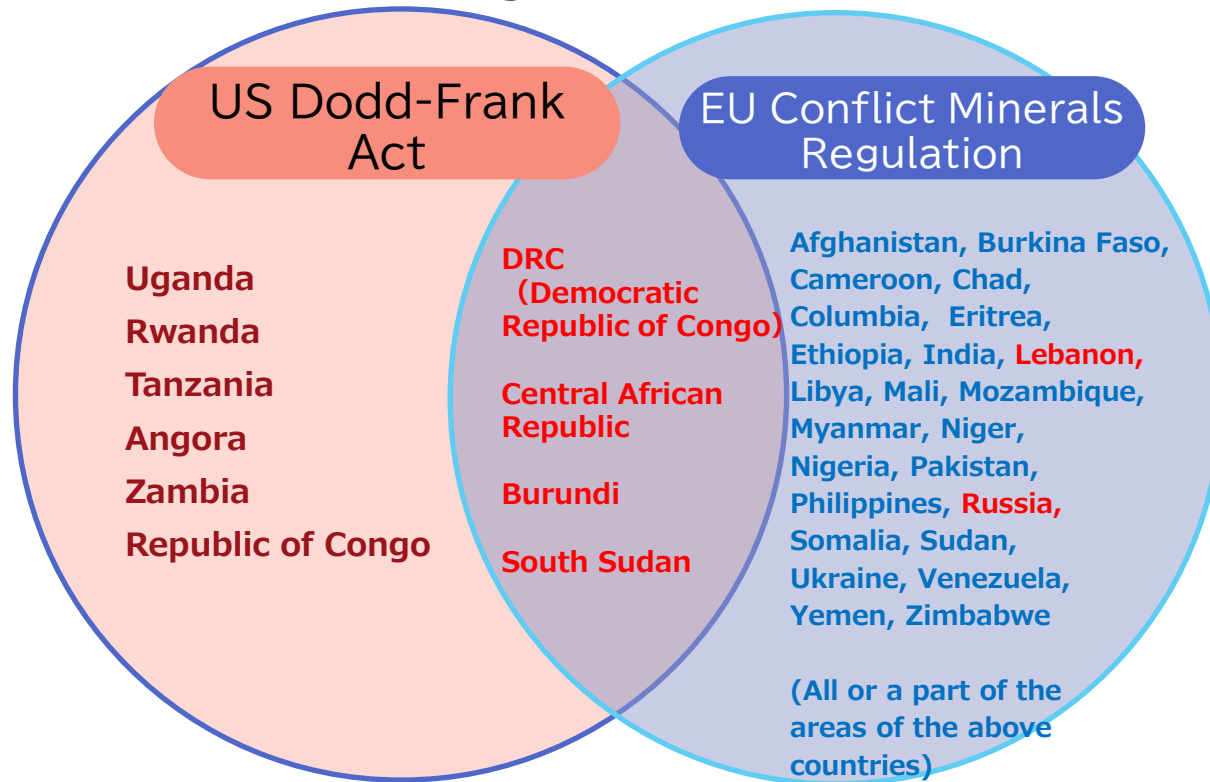
Overview of assessment

Burundi is considered a high-risk area under Regulation 2017/821. Several organisations have reported human rights and international law violations occurring in Burundi. These organisations include the Office of the United Nations High Commissioner for Human Rights (OHCHR), Amnesty International, Human Rights Watch (HRW), and the US Bureau of International Labor Affairs (ILAB).

The UN Office of the High Commissioner for Human Rights closed its office in Burundi in February 2019 and the government continues to refuse access to the country to the UN Commission of Inquiry on Burundi (OHCHR, 2020). However, Amnesty International report that relations with international partners improved in early 2022, as political dialogue resumed with the EU and Rwanda (Amnesty International, 2022). In October 2022, the border with Rwanda was reopened after years of closure (Crisis Group, 2022). Following renewed tensions between the two countries over reported support to rebel groups, the border Burundi closed again in January 2024, Rwanda (Crisis Group, 2024).

How CAHRAs should be used in RMAP

Not all of the DRC+9 countries covered by the US Dodd-Frank Act (DFA) are included in the EU Conflict Minerals Regulation's CAHRA List

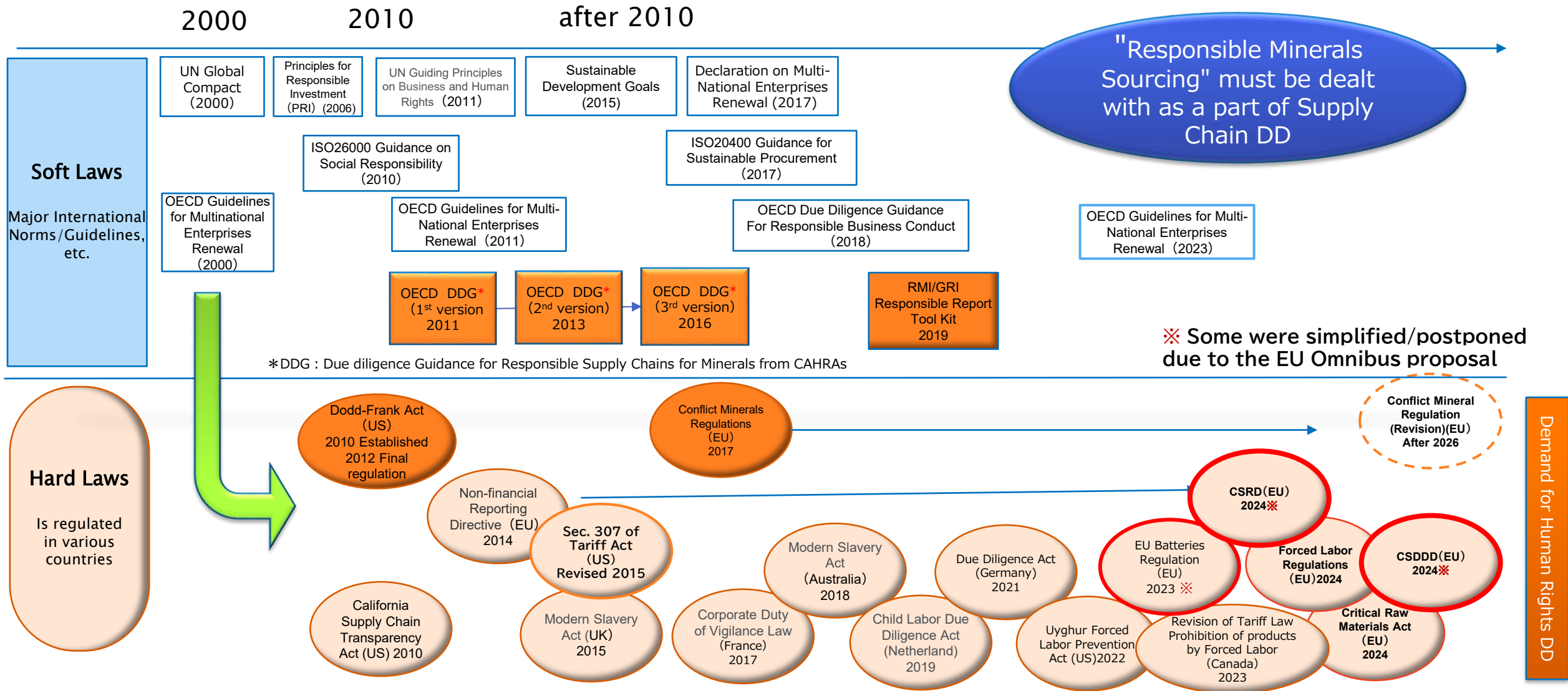


RMI defined that in the RMAP assessment, CAHRAs shall include, at a minimum, the following countries and released on its website, a [guidance document](#).

- ① **Democratic Republic of Congo and its 9 surrounding countries**
(Scope of US Dodd-Frank Act)
- ② **EU's CAHRAs list**
(Scope of EU Conflict Minerals Regulation)
- +
- ③ **Areas that each Smelter individually identifies as CAHRAs based on other risk database, etc.**

- ✓ EU's CAHRAs list is an **indicative, non-exhaustive and regularly updated** list, and eventually, **each company (or the company's customer) must conduct DD at its own decision** referring to related information. (Some customers may define its unique CAHRAs different from the EU List)

Global trends surrounding “Responsible Minerals Sourcing”



Shift from International Norms/Guidelines (Soft Laws) to Mandatory Requirements (Hard Laws)

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Laws and regulations dealing with RMI Templates (CMRT, EMRT, AMRT)

■ Contents of templates differ by covered mineral due to applicable regulations

	CMRT Conflict Minerals Reporting Template	EMRT Extended Minerals Reporting Template	AMRT Additional Minerals Reporting Template
Covered minerals	Tin, tantalum, tungsten, gold (3TG)	Cobalt, mica +copper, graphite, lithium, nickel (minerals added from Apr. 2025)	Minerals not covered by CMRT and EMRT
Release of 1 st ver.	2011.7.19	2021.10.20 (CRT:2018.3.1、MRT:2020.10.28)	2022.11.11 (at the time of PRT release)
Major applicable laws and regulations	Dodd-Frank Act EU Conflict Minerals Regulation EU-CSDDD	EU Battery Regulation EU-CSDDD (No applicable law at the time of the 1 st ver. of EMRT. Objective: DD for child labor risks in cobalt•mica mines)	EU-CSDDD
Basic due diligence elements	Included	Included	Not included (Objective: To specify the pinch point)
Enforceability arising from legal basis	Strong	Strong only in regard to battery materials	Weak
Others		Minerals are scheduled to added in stages	Expected to be integrated into EMRT

EU Corporate Sustainability Due Diligence Directive

© EU Corporate Sustainability Due Diligence Directive (CSDDD/CS3D)

<Obligations imposed on companies subject to CSDDD>

- Stipulate DD policy • Specify and assess risks • Prevention, authority and correction of risks • Monitoring
- Disclosure • Complaint mechanism • Stakeholder engagement

Covered companies	Conditions (some conditions were relaxed from the draft)	Application Date	
EU Companies	① Has a net worldwide turnover of over EUR 450 million and over 1,000 employees on average in the latest financial year; ② Is the ultimate parent company of a group that reaches the threshold of ① ③ Has entered into franchising and licensing agreements with royalties of more than EUR 22.5 million in the EU and a worldwide net turnover of more than EUR 80 million (either alone or as ultimate parent company of a group) in the latest financial year	Has a net worldwide turnover of more than EUR 1500 million and more than 5000 employees	July 26, 2028 (postponed for 1 year: see next page)
		Has a net worldwide turnover of more than EUR 900 million and more than 3000 employees	July 26, 2028
		Has a net worldwide turnover of more than EUR 450 million and more than 1000 employees	July 26, 2029
Non-EU Companies	① Has a net EU turnover of over EUR 450 million in the latest financial year ② Is the ultimate parent company of a group that reaches the threshold of ① ③ Has entered into franchising and licensing agreements with royalties of more than EUR 22.5 million in the EU and net turnover of more than EUR 80 million in the EU (either alone or as ultimate parent company of a group) in the latest financial year	Has a net turnover of more than EUR 1500 million in the EU	July 26, 2028 (postponed for 1 year: see next page)
		Has a net turnover of more than EUR 900 million in the EU	July 26, 2028
		Has a net turnover of more than EUR 450 million in the EU	July 26, 2029

※ Please note that, even if a company does not have a base in EU, if it satisfies a certain turnover threshold in EU individually or on a consolidated basis, it will be directly subject to the application of CSDDD

<Recent progress>

- Was adopted by the EU Parliament on June 13, 2024, entered into force on July 25, 2024
- In Nov. 2024, the EU Commission announced to submit a package of proposals (Omnibus proposal) to simplify regulations relating to sustainability (① CSDDD, ② EU Taxonomy, ③ CSRD(Corporate Sustainability Reporting Directive), ④ CBAM (Carbon Border Adjustment Mechanism))
- On February 26, 2025, published the “Omnibus proposal (1st package)”
- A part of the proposal (postponing the time of application) was approved on April 3, 2025 and adopted by the EU Council on April 14, 2025

EU Omnibus Proposal(1st package/published: Feb. 26, 2025)

<Main changes to CSDDD by the Omnibus proposal>

Items	Initial Directive	Omnibus Proposal
Transposition deadline	July 26, 2026	July 26, 2027
Application date (first wave)	July 26, 2027	July 26, 2028
Guideline publication	January 26, 2027	July 26, 2026
Definition of stakeholder	Wide range of interested parties	Interested parties that are directly affected by the company's business activities
Engagement with stakeholders	Consultation of stakeholders shall take place at the following stages: ①when gathering necessary information relating to adverse impacts; ②when developing prevention and corrective action plans; ③when deciding to terminate or suspend a business relationship; ④when adopting appropriate measures to remediate adverse impacts; and ⑤when developing qualitative and quantitative indicators for monitoring.	Delete ③ and ⑤
Target of risk assessment	The company's business and that of its direct/indirect business partners	The company's business and that of its direct business partners (includes indirect business partners if they have plausible information that suggests human rights/environmental risk)
Monitoring frequency	Once a year	Once every 5 years
Termination	Mandatory termination of contracts (and termination of transaction) with non-compliant suppliers	No obligation to terminate contracts (and transactions)
Civil liability	May assume civil liability in case of non-compliance	Subject to national law
Penalties	Maximum limit of penalties shall be not less than 5% of a company's worldwide net turnover	Subject to national law
Harmonization	Member states are allowed to introduce more stringent provisions	Member states are restricted from introducing more stringent rules
Climate transition plans	Required to put into effect a transition plan for climate change mitigation	Implementation of a transition plan for climate change mitigation is voluntary (formulation of such plan is mandatory)

EU Battery Regulation(1)

© EU Regulation concerning Batteries and Waste Batteries (EUBR)

<Subject batteries>: Portable batteries, LMT (Light means of transport) batteries, SLI batteries, EV batteries, industrial batteries

<Main legal requirements>: Declaration of carbon footprint (Article 7), Usage ratio of recycled content (Article 8), **Due diligence policy (Chapter 7: Articles.47-53)**

<Composition of Chapter 7 (DD provisions)>:

Art. 47 Scope of this Chapter
Art. 48 Battery DD policies
Art. 49 Economic operator's management system
Art. 50 Risk management obligations

Art. 51 Third-party verification of battery DD policies
Art. 52 Disclosure of information of battery DD policies
Art. 53 Recognition of DD schemes (industry schemes)

<Covered Minerals/Risks> (Reference: Regulation Annex X)

Minerals

• cobalt • natural graphite
• nickel • lithium
+ and its compounds



Environment/Social Risks

• atmosphere (incl. GHG discharge) • water • soil • biodiversity • harmful substance • noise and vibration • factory safety • energy consumption • waste material and residual material • industrial safety and health • child labor • forced labor • discrimination • freedom of association • life of indigenous communities

- ✓ In the guideline scheduled to be published, due diligence is expected to be limited to the 4 minerals and its compounds used in the manufacturing of active material (electrode material) and electrolytic solutions of batteries placed on the EU market (Continued attention needs to be paid to the guideline)
- ✓ Due to the addition of minerals to EMRT, it is possible that products subject to due diligence may be expanded beyond batteries

EU Battery Regulation (2)

- ✓ On May 21, 2025, the European Commission(EC) **approved the Omnibus proposal (4th package)(including revisions of the EU Battery Regulation)** seeking to simplify and to increase efficiency of the regulations relating to sustainability
- ✓ The revised Omnibus Proposal includes ① **raising the threshold of companies required to report**, and ② **revision of the DD Chapter of the EU Battery Regulation**

<EU Omnibus Proposal(4th package) Revision of the DD Chapter of the EU Battery Regulation>

https://single-market-economy.ec.europa.eu/publications/obligations-economic-operators-concerning-battery-due-diligence-policies_en

Item	Contents of the revision
Covered companies	Medium scale companies (proposal: yearly net turnover below 150 million euro) will be exempted in addition to SMEs from the original draft, and the number of companies covered by this regulation will decrease.
Reporting obligations of DD policy	Frequency to revise and report DD policy (information disclosure) was proposed as once a year in the original proposal but is reduced to once in 3 years (DD/Audit is scheduled to be conducted every year)
Application date	Postponed to August 18, 2027 (initially August 18, 2025) (Due to the fact that notified bodies responsible for third party verification and the industry scheme that serves as a benchmark for DD compliance is not certified at this time)
Deadline of publication of guidance	Publication of the guidance regarding to the DD Chapter is postponed to July 26, 2027 (initially February 2025) (because it is necessary to harmonize the CSDDD guidance and the DD Chapter of EU Battery Regulation)

Future plans

- The latest EC Omnibus proposal will be adopted after approval by the European Parliament and the Council of the EU (EU member nations) (it is possible that a wide revised proposal will be attached and discussed by the parliament/council)
- As the deadline of the application of DD requirements (August 18, 2025) is coming closer, **revision regarding to postponement of the “Application date” and “Publication of guidance” will be processed through a more rapid legislative procedures than usual**, and **postponement of the “Application date” is expected to be settled within a few months.**

US Uyghur Forced Labor Prevention Act

◎US Uyghur Forced Labor Prevention Act (UFLPA) Established in Dec. 2021. Enforced from June 2022

- **Prohibits, in principle, importation of goods mined, produced or manufactured wholly or in part** in Xinjiang Uyghur Autonomous Region
- In the enforcement strategy of UFLPA, **goods that are produced by entities** that are identified as producing goods using forced labor in XUAR and **listed in the UFLPA Entity List will also be presumed as being subject to the import ban.**

<UFLPA Entity List> <https://www.dhs.gov/uflpa-entity-list>

As of May 2025: **160 companies/organization** are listed (as of May 2024: 65 companies/organizations)

- If the Commissioner of the US Customs and Border Protection (CBP) determines that an importer or goods fulfills the following requirements, such importer or goods will not be subject to the import ban, as an exception:
 - ① the importer has (i) **fully complied with the importer guidance** in the UFLPA Strategy and (ii) **completely and substantively responded to all inquiries for information submitted by the CBP Commissioner** to ascertain whether the goods were mined, produced or manufactured wholly or in part by forced labor; and
 - ② established, by **“clear and convincing” evidence**, that the good was not mined, produced, or manufactured wholly or in part by forced labor
- In July 2024, **aluminum, PVC (polyvinyl chloride) and seafood** was added to the high-priority sectors (originally apparel, cotton, silica products (including polysilicon), tomatoes)

✓ Be aware that rejection of a specific smelter may be requested by reason of UFLPA

© US OFAC (Office of Foreign Asset Control) Regulations

- A regulation established by the Office of Foreign Asset Control (OFAC) of the US Treasury, for foreign policy and security purposes, **banning direct and indirect transactions** with countries or regions and specific individuals or groups designated by the US (listed in the SDN list) and to freeze their assets.
- Areas/countries covered by Active Sanctions Programs (as of May 2025):
Afghanistan, Balkan Peninsula, Belarus, Myanmar, Central African Rep., China, Cuba, Democratic Republic of Congo, Ethiopia, Hong Kong, Iran, Iraq, Lebanon, Libya, Mali, Nicaragua, North Korea, Russia, Somalia, Sudan, Darfur, South Sudan, Syria, Ukraine/Russia related, Venezuela, Yemen, Zimbabwe, etc.

(Ref: OFAC website)

Sanctions Programs and Country Information

<https://ofac.treasury.gov/sanctions-programs-and-country-information>

SDN List (Specially Designated Nationals and Blocked Persons List):

<https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>

Cases of enforcement:

<https://ofac.treasury.gov/civil-penalties-and-enforcement-information>

- ✓ As US companies/organizations are prohibited to conduct direct/indirect transaction with individuals or groups covered under the sanction, you may be required by a customer company to reject a specific smelter by reason of the OFAC regulation.
- ✓ Be aware that RMI is unable to conduct smelter audit to such covered areas/countries

Product Certification Standards(EPEAT)

© US EPEAT(Electronic Product Environmental Assessment Tool)



- ✓ Is an ecolabel for the purpose to promote environmentally preferable electronic products.
- ✓ Is one of the ecolabels that have high market needs (for example, in US public procurement, EPAT products are procured on a priority basis)
- ✓ “Responsible Supply Chains Criteria” (including conflict minerals) was added in the latest revision (2025), and **a Conformant Rate of 65% or higher** is set as a required criteria to obtain the **ecolabel** (Of the covered minerals, 3TGs are required criteria, cobalt is an optional criteria)
- ✓ Application under the new criteria will start from Nov. 2025. Application under the previous criteria will not be accepted from July 2026

【Covered Products】

- ① **Imaging equipment (multifunction printers, printers, etc.);** ② **PCs, displays;**
③ **Servers;** ④ **TVs;** ⑤ **Mobile phones**

* **Scheduled to be expanded to solar facilities, network equipment, wearable appliance**

- ✓ It is expected that requests to use only conformant smelters from client companies handling covered products will increase.
- ✓ It is necessary to conduct periodic monitoring as the conformant status of smelters constantly vary
- ✓ It is important to enhance efforts such as checking supplier’s responses and conduct corrective measures

Moves to expand covered risks

RRA(Risk Readiness Assessment)V3: Published Oct.19, 2023

- Is a self-assessment tool by which companies in the mineral supply chain assess its due diligence efforts in regard to ESG risks (33 items)
- Revised version(V3) conforms with the UN Guiding Principles for Business and Human Rights and OECD Due Diligence Guidelines for Multinational Enterprises and is applicable to downstream companies in addition to upstream companies
- Companies that undergo RMAP Assessment or Downstream Assessment Program are required to comply with RRA
- Due to the above changes, RMI undertakes to review the ESG standard for Smelters. The new standard was released in April 2025 (Next page)

Risk Sectors/Items(33 Items) Items in red do not apply to downstream companies

E:Environmental

- Climate Action
- Greenhouse Gas Emissions Reductions
- Water Stewardship
- Waste Management
- Circular Economy
- **Tailings Management**
- Biodiversity and Productive Land
- Pollution

S:Social

- No Child Labor
- No Forced Labor
- Freedom of Association and Collective Bargaining
- Non-Discrimination and Harassment
- Diversity, Equity and Inclusion
- Employment Terms
- Occupational Health & Safety
- Emergency Preparedness
- Community Health & Safety
- **Community Development**
- Artisanal & Small-Scale Mining (ASM)
- **Security & Human Rights**
- **Indigenous Peoples' s Rights**
- **Land Acquisition & Resettlement**
- **Culture Heritage**

G:Governance

- Management System
- Risk Assessment
- Business Integrity
- **Revenue Transparency**
- Legal Compliance
- Sustainability Reporting
- Grievance Mechanism
- Stakeholder Engagement
- **Mine Closure & Reclamation**
- Responsible Supply Chains

Moves to expand covered risks

Re-examination of ESG standards

On April 30, 2025, RMI released the following 2 options for assessment of facility standards for environmental, social, governance, and occupational health and safety in order to take measures against ESG risks required by laws and regulations of various countries

<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/issues/esg-issues/>

- ① **Facility Standard for Social, Environmental, OHS and Governance Risks**
(Covers pinch-point)
- ② **Supply Chain Due Diligence Plus**
(Covers suppliers from tier 1 to mine level of the pinch-point)

① Facility Standard for Social, Environmental, OHS and Governance Risks

Purpose:

For facilities to assess ESG risk management within its own operation

Available as a stand-alone assessment or in combination with the Responsible Minerals Assurance Process (RMAP) and/or Downstream Assessment Program (DAP)



② Supply Chain Due Diligence Plus

Purpose:

For facilities to assess ESG due diligence and verify ESG risk management practices within their mineral supply chains

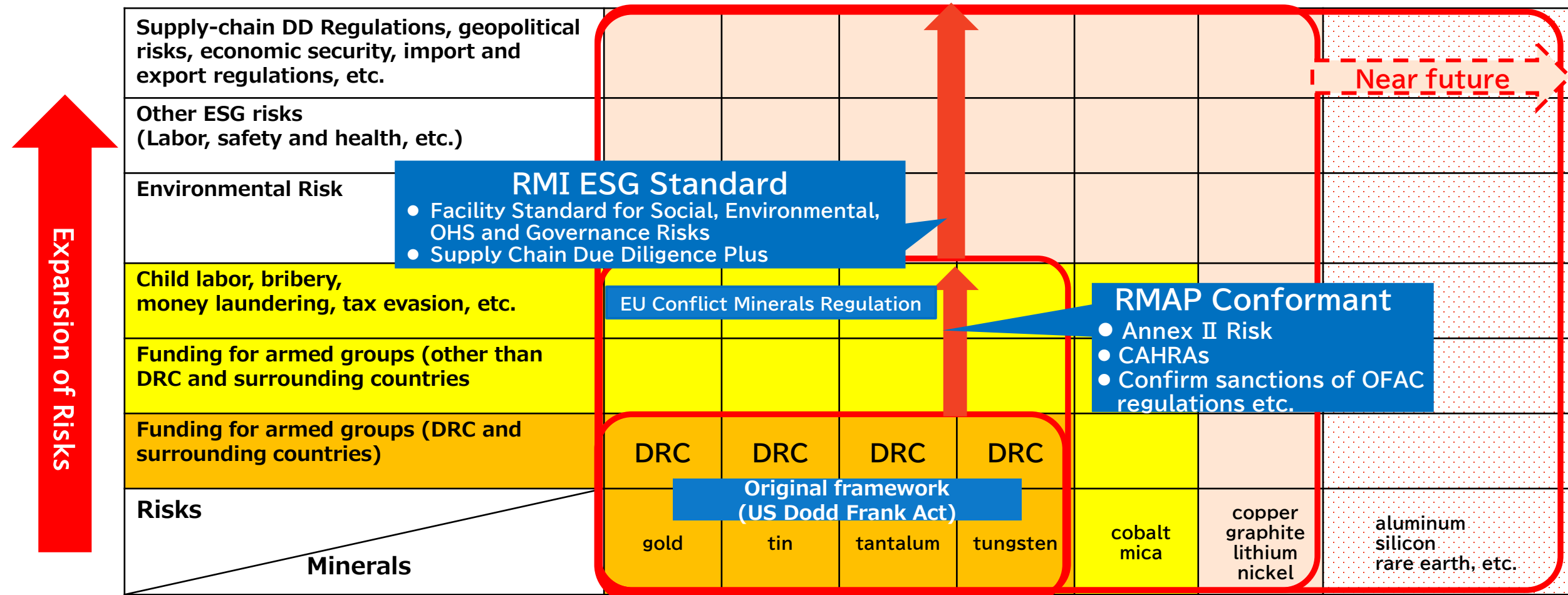
Available only in combination with the Responsible Minerals Assurance Process (RMAP) and/or Downstream Assessment Program (DAP)



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Latest trends of Responsible Minerals Sourcing(Change of trends)



Expansion of Minerals

To prepare for new regulations, RMI is undertaking to arrange a Responsible Minerals Sourcing framework that covers all minerals

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Business and Human Rights

2011 UN “Guiding Principles on Business and Human Rights (UNGPR)”

- ✓ **“Guiding Principles on Business and Human Rights: UN ‘Protect, Respect and Remedy’ Framework”** is a documentation that was unanimously endorsed by the UN Human Rights Council in 2011.
- ✓ Consists of the three pillars “The state’s duty to protect human rights”, **“The corporate responsibility to respect human rights”** and “Access to remedy”.

What the Guiding Principle requires to Business Enterprises

- ① Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur.
- ② Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

⇒ This Guiding Principle led to companies being required to conduct Human Rights DD in supply chains. Various international guidelines, hard laws and treaties by various countries and policies by the Japanese Government established thereafter are based on the contents of this Guiding Principle.

It is important to understand that companies are required to deal with “Responsible Minerals Sourcing”, considering it as part of “Human Rights and Business”

Guiding Principles on Business and Human Rights		
Pillar 1	Pillar 2	Pillar 3
The State’s Duty to Protect Human Rights	The Corporate Responsibility to Respect Human Rights	Access to Remedy
Operational Principles	Operational Principles	Operational Principles
<ul style="list-style-type: none">• General State regulatory and policy functions• The State-business nexus• Support corporations to respect human rights in conflict-affected areas• Ensure policy coherence	<ul style="list-style-type: none">• Commitment by company policy• Human rights due diligence• Process to enable remediation• Measures based on the current situation	<ul style="list-style-type: none">• State-based judicial procedures• State-based non-judicial grievance mechanisms• Non-State-based grievance mechanisms• Effectiveness criteria for non-judicial grievance mechanisms

EU Regulation to Prohibit Products Made Using Forced Labour

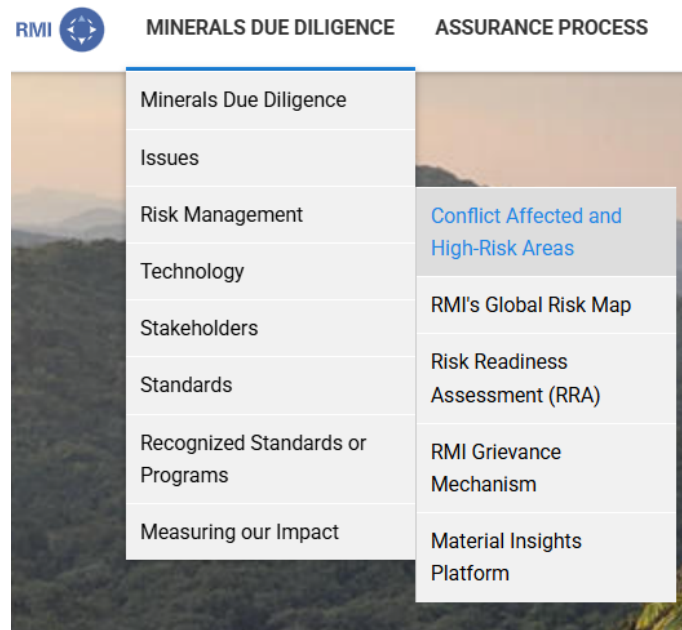
◎ Regulation prohibiting products made with forced labour distributed in EU or imported/exported to/from EU

<Overview>

- Adopted by the European Council **on Nov. 19, 2024, published on the Official Journal of the EU and entered into force on Dec. 12, 2024.**
Will become **applicable to member states 3 years after the effective date.**
 - By June 2026, European Commission is scheduled to prepare guidelines, portable website, platforms, etc.
<Reference info.> Forced Labour Single Portal (Trial ver. is released)
[EU Regulation 2024/3015 on prohibiting products made with forced labour on the Union market - Sustainable Views](#)
 - **Prohibiting distribution and removal from the market;**
“Products made with forced labour” is defined as products in which forced labour is used in all or a part of the extraction, harvesting, production or manufacture (including any work or process relating to products in any stage of the supply chain) stage
Geographic origin or industry is not limited in respect to products; therefore, a wide range of forced labour products are covered by this regulation
EU authorities (member nation’s authorities or European Commission) **are authorized to** investigate products suspected of forced labour violation, and if violation is confirmed, order the operator to **withdraw or dispose the violating product from the EU Market**
 - **Risk-based approach:**
Is assessed by the risk-based approach according to the scale and severity of the suspected forced labour(including whether state-imposed forced labour may be a concern); **the quantity of the products in the EU and the share of the part suspected to have been made with forced labour in the final product**
 - **Competent authorities:** European Commission will have jurisdiction for cases of non-EU countries. Member nation’s national authorities will have jurisdiction for cases within EU
- ✓ EU authorities have the burden of proving involvement in forced labour (this differs from US UFLPA).
 - ✓ If the violating operator does not comply with the EU Authority’s decision within a reasonable period of time,, enforcement action regarding the decision will be taken

Examples of sources for risk information

■ List of open information sources introduced on the RMI website



List of Open Information Sources

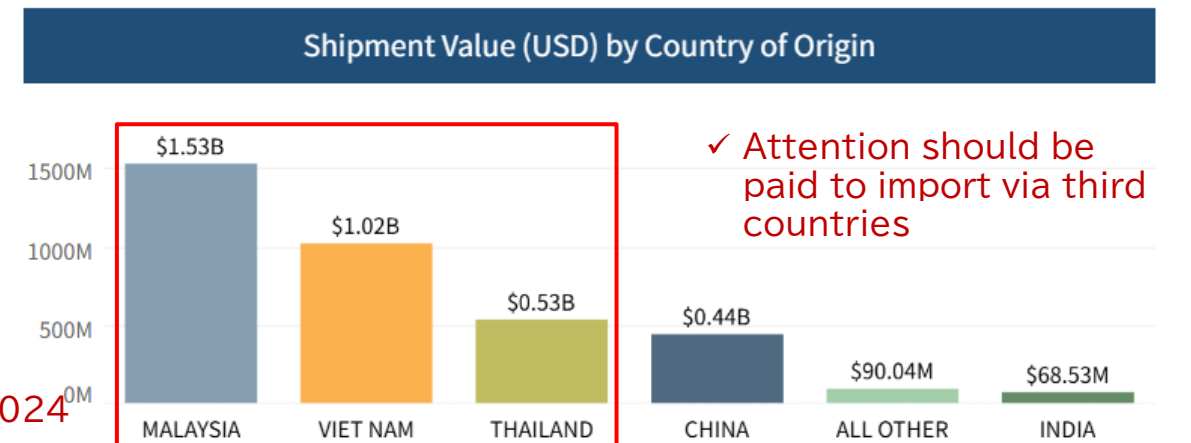
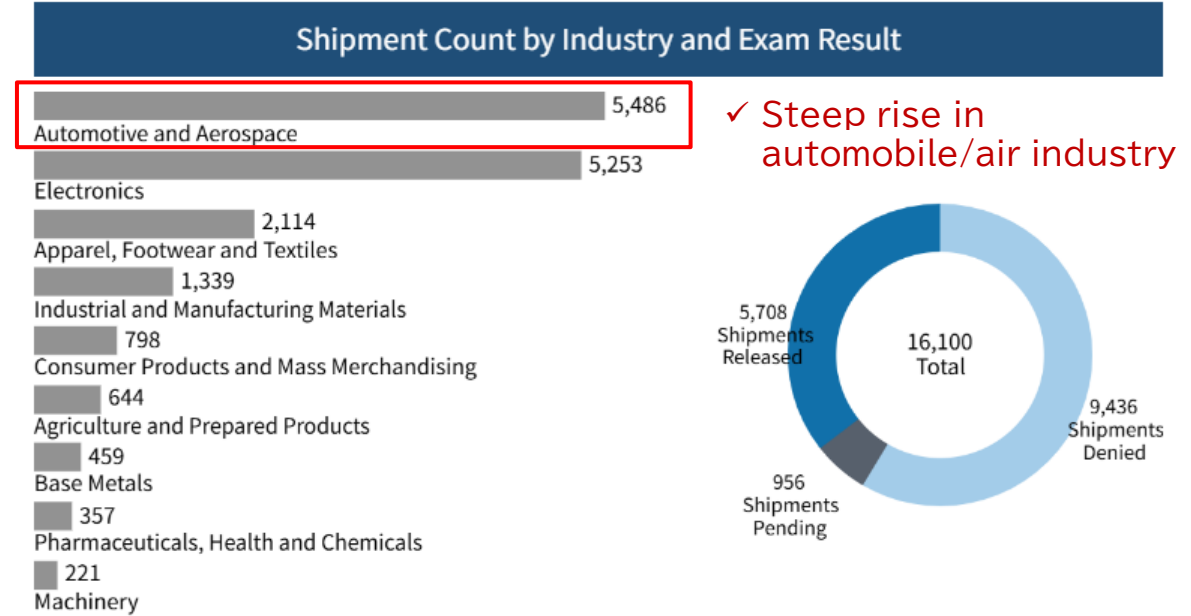
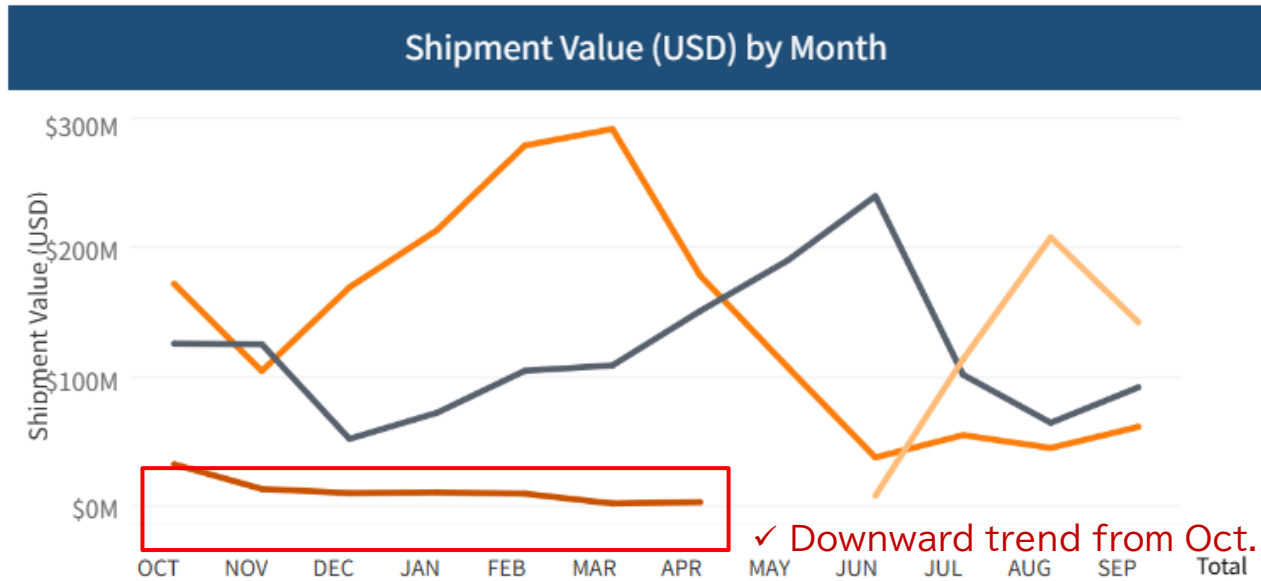
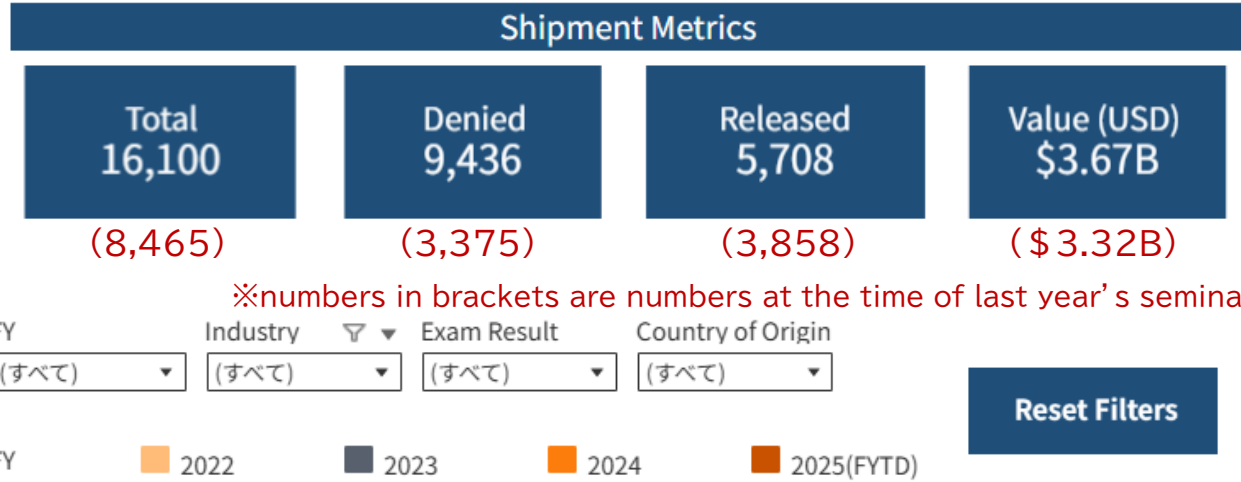
Note: these resources are developed and maintained by external organizations.

Criterion	Coverage	Open sources
CONFLICT	Global	Heidelberg Conflict Barometer
		Rule of Law in Armed Conflicts (RULAC - Geneva Academy)
		Assessment Capacities Project – Global Emergency Overview
		Uppsala Conflict Data Program – Georeferenced Event Dataset
		CrisisWatch
		Global Peace Index
		Major Episodes of Political Violence
		Armed Conflict Location and Event Data (ACLED)
		World Bank list of Classification of Fragile and Conflict-Affected Situations (FCS)

■ Examples of information sources disclosed by conformant smelters in its DD reports (published on RMI's website)

- Covered countries stipulated in US Dodd-Frank Act
- Heidelberg Conflict Barometer
- Worldwide Governance Indicators
- Sanctioned person list published by MOF INFORM Global Risk Index
- Fragile State Index
- CAHRAs set forth by EU

(Reference) Statistics of the status of execution of UFLPA (as of May 2025)



Source: US CBP website (<https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics>)

Changes in the latest templates (2025)

CMRT 6.5

Released on Apr. 25, 2025
(next revision scheduled in spring 2026)

<Changes>

- ✓ Update of Smelter Reference List and Standard Smelter List
→ No significant impact on survey practice

EMRT 2.0

Released on Apr. 25, 2025
(next revision scheduled in spring 2026)

<Changes>

- ✓ Addition of 4 minerals(copper, nickel, lithium, graphite) to cobalt and mica for the purpose to comply with the EU Battery Regulation
- ✓ Addition of Mine List(answer is on a voluntary-base)
- ✓ Update of Smelter Reference List and Standard Smelter List

AMRT 1.21

Released on May 16, 2025
(next revision scheduled in fall 2025)

<Changes>

- ✓ Update of explanations of “Minerals Scope” tab

Precautions for the latest templates (2025)

CMRT 6.5

<Notes>

- ✓ Some tins smelters that are on the Conformant Smelter List as of June 2025 (shutdown in June 2024 and scheduled to be deleted from the Conformant Smelter List) are already deleted from the “Smelter Look-up” tab in CMRT6.5. Due to such difference, attention must be paid when making entries in the Smelter List (if the CID No. of such smelter is entered in the A column an error message will be displayed)
- ✓ Such discrepancy arises due to the difference in the update frequency of the Conformant Smelter List of the RMI website and the Standard Smelter List/Smelter Reference List
→It is necessary to select 「Smelter Not Listed」 and enter (transcribe) smelter information

【RMI website】 <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

TO BEGIN:

Option A: If you know the Smelter Identification Number (SIN) of the smelter, select "Option A" and enter the SIN in the "Smelter Identification Number" column.

Option B: If you have a list of smelters, select "Option B" and enter the smelter name in the "Smelter Name" column. The system will automatically populate the SIN and other information.

Option C: If you have a list of smelters, select "Option C" and enter the smelter name in the "Smelter Name" column. The system will automatically populate the SIN and other information.

(*) Mandatory fields are marked with an asterisk (*).

(1) Entry required when Smelter Look-up = "Smelter not listed".

NOTE: A combination of Options A, B, and C must be selected. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by emailing RMI@responsiblemineralsinitiative.org.

e.g.: CID002835:

- As of June 10, 2025, the smelter is listed in the Conformant Smelter List (scheduled to be deleted)
- As of June 24, 2024, the smelter is deleted from the Standard Smelter List (shutdown)

Smelter Identification Number Input	Smelter Name	Smelter Country (*)	Smelter Identification Number	Source of Smelter Identification Number	Smelter Street
CID002835	Tin	INDONESIA	CID002835	RMI	

Select "Smelter Not Listed" and enter smelter information (transcribe)

Name of List	Update Information
Conformant Smelter lists	January /July (shutdown etc.) ※ At any time, in case of audit non conformity
Standard Smelter lists	Update whenever necessary (revision history is also published)
Smelter Reference lists	List included in the “Smelter Look-up” tab of CMRT is only updated once a year (at the time of CMRT revision)

Precautions for the latest templates (2025)

EMRT 2.0/AMRT 1.21

<Notes>

When selecting (deleting any minerals/metals) in the "Select Minerals/Metals in Scope" of the "Declaration" Sheet, selected minerals are auto-populated under the Declaration questions in alphabetical order, however, **if you make add or delete a mineral after selecting an answer, the order of minerals will change but the selected answers will not shift.**

→ Confirm whether the answers of Q1-7 and C (in case of AMRT: Q1 and 2) corresponds with the appropriate mineral on the "Declaration" sheet before submitting your completed EMRT (or AMRT).

【RMI website】 <https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/>
<https://www.responsiblemineralsinitiative.org/reporting-templates/amrt/>

対象となる鉱物／金属を選択 (*):	Cobalt	(Delete Copper)	Graphite
	Lithium	(Delete Mica)	Nickel

Cobalt(*)	Yes
Graphite(*)	No
Lithium(*)	Unknown
Nickel(*)	Not declaring

Selected (not deleted) minerals are displayed

(Delete Cobalt)	(Delete Copper)	Graphite
Lithium	(Delete Mica)	Nickel

Graphite(*)	Yes
Lithium(*)	No
Nickel(*)	Unknown
	Not declaring

Delete a mineral after selecting answer

The minerals have shifted but the answer remain in place