RMAP and Due Diligence (DD) Efforts of Downstream Companies

June 26, 2025

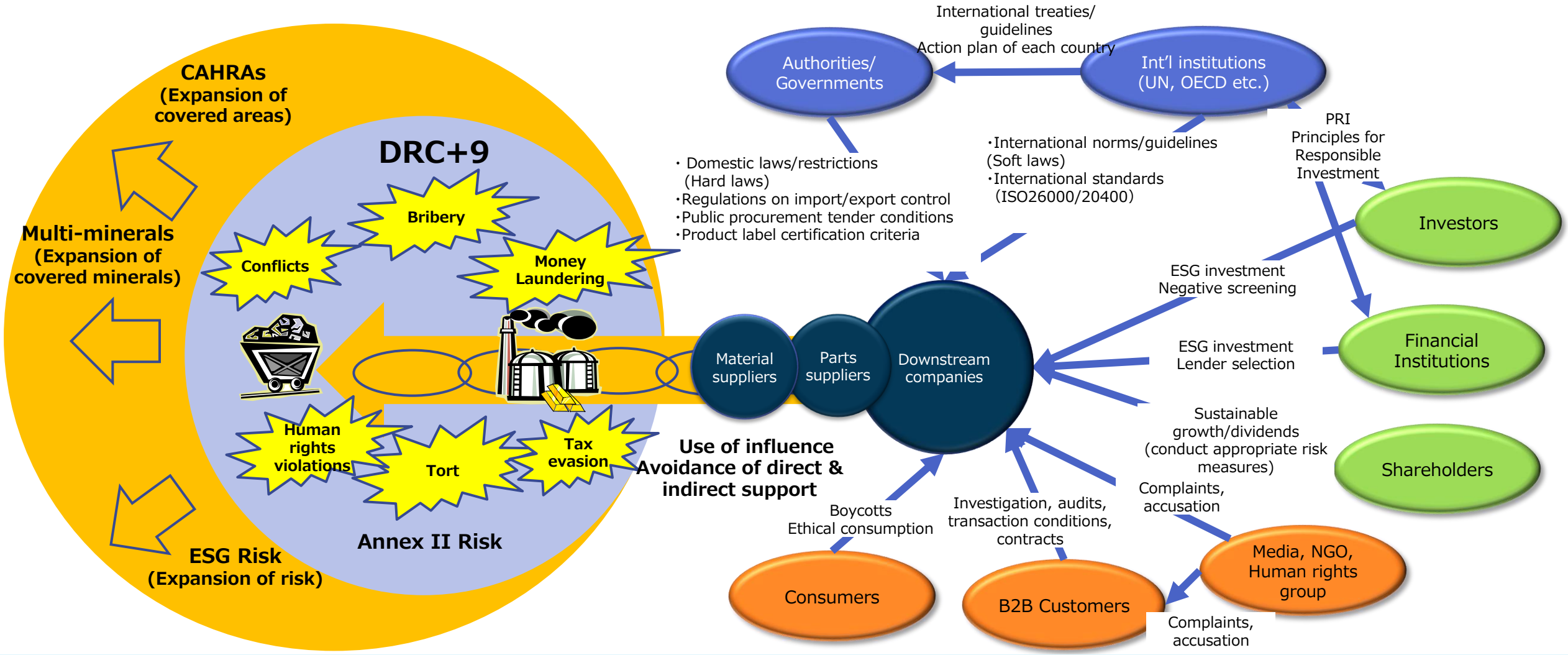
Japan Electronics and Information Technology Industries Association (JEITA)

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.

The Necessity of Due Diligence and Changes in Environment



The upstream of minerals supply chains are often conflict-affected areas with high risk in human rights violations, etc.
As stakeholders become diversified, downstream companies face various requests regarding Responsible Minerals Sourcing

Due Diligence (DD)

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⇒ Assess risks (e.g. human rights violation) inherent in the procurement supply chain of covered minerals and take actions to redress any issues that are identified

<Key points of DD>

① Promoting process based on OECD Due Diligence Guidance

② Risk assessment based on RMAP

<Glossary>

OECD Due Diligence Guidance:
An international guideline specifying due diligence for responsible minerals sourcing set forth by the OECD (Organisation for Economic Co-operation and Development)

RMAP: Responsible Minerals Assurance Process
A survey program developed by RMI (A US trade group: Responsible Minerals Initiative)
Enhance efficiency of survey by targeting Smelters in such surveys.

Due Diligence (DD) 5 Steps

“Framework of the 5 steps to achieve the target” required in the OCED Due Diligence Guidance

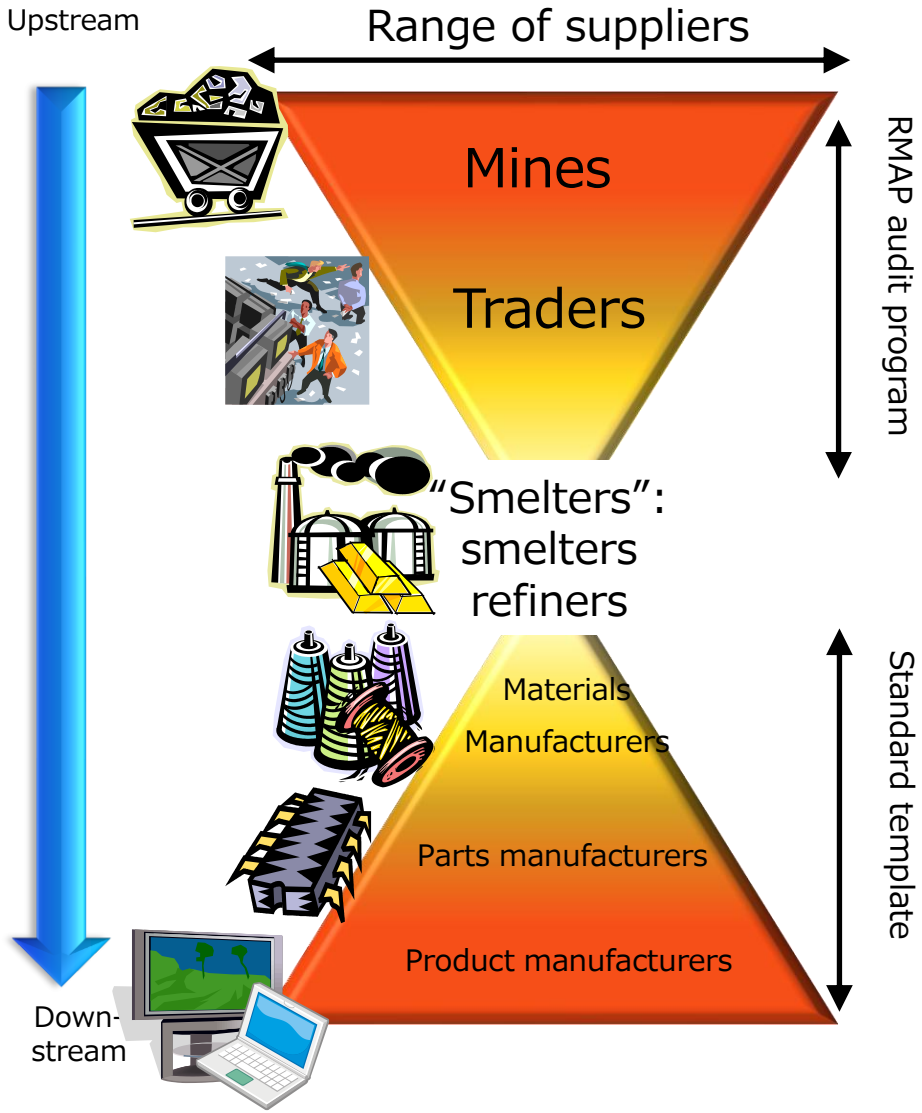
- Step 1: Establish strong company management systems
- Step 2: Identify and assess risks in the supply chain
- Step 3: Design and implement strategies to respond to identified risks
- Step 4: Carry out independent third-party audits of Smelters’ due diligence
- Step 5: Report annually on supply chain due diligence

<Resources that downstream companies may refer to>

OCED guidance: Supplement on Tin, Tantalum and Tungsten/Supplement on Gold

(MOFA website) https://www.mofa.go.jp/mofaj/gaiko/csr/housin.html

RMAP (Responsible Minerals Assurance Process)



- Involves huge cost and time for companies to do their own audits 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 (processors)

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

Due Diligence 5 steps（Examples）

5 Steps in OECD Due Diligence Guidance	Main Processes and Procedures
Step 1: **Establish strong company management systems**	・Establishment of organizational structure ・Formulation and publicize the "Responsible Minerals Sourcing Policy" ・Report of the results of efforts and preparation of operation rules ・Stipulate management procedures and establishment of company rules ・Establishment and implementation of an in-house education system and a system for supplier
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<Step 1> Establish strong company management systems (Examples)

1. Establishment of organizational structure
   Create an organization that is directly under the BOD, assign a director in charge

2. Formulation of the "Responsible Minerals Sourcing Policy"
   Objective of efforts、covered minerals, conformance to DD guidance, response policy, etc.

3. Report of the results and preparation of operation rules
   Stipulate the place and frequency of reporting, and approval/reporting channel, etc.

4. Stipulate management procedures and establishment of company rules
   To stipulate and document in writing procedures regarding Responsible Minerals Sourcing Management
   (Target: supplier survey, collection of survey and risk analysis, response to customers, etc.)

5. Establishment of an education system for internal use/suppliers and implementation of such education
   Implement education on Responsible Minerals Sourcing to concerned persons within the company, stakeholders, etc.

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<Step 2> Identify and assess risks in the supply chain (Examples)

1. Implementation of preliminary surveys: JOGMEC Material Flow

■ **Material Flow of Minerals** (https://mric.jogmec.go.jp/report/?category%5B%5D=material_flow)

○ Analysis on trends, etc. of domestic demand/supply and export/import of base metals and rare metals, issued by the Japan Organization for Metals and Energy Security (JOGMEC)【Published annually】

■ Listed Types of Minerals

Copper, lead, zinc, tin, platinum group (PGM), rare earth, lithium, nickel, cobalt, chrome, tungsten, vanadium, manganese, zirconium, niobium, tantalum, molybdenum, antimony, titanium, magnesium, fluorine, barium

■ Posted information

Resource-producing countries/consumer countries, overview of trade, characteristics/use, trend of demand/supply, trend of export/import, exporting/importing countries, export/import price, material flow, etc.

➢ Products and major use of minerals and metals are reported. Is useful to promote basic understanding of minerals and metals.

<Step 2> Identify and assess risks in the supply chain (Examples)

1. Implementation of preliminary surveys: JOGMEC Material Flow

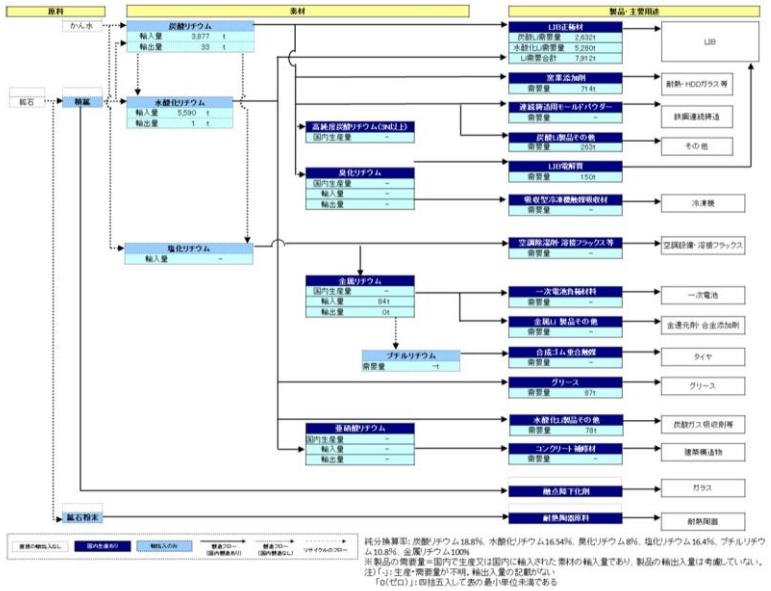
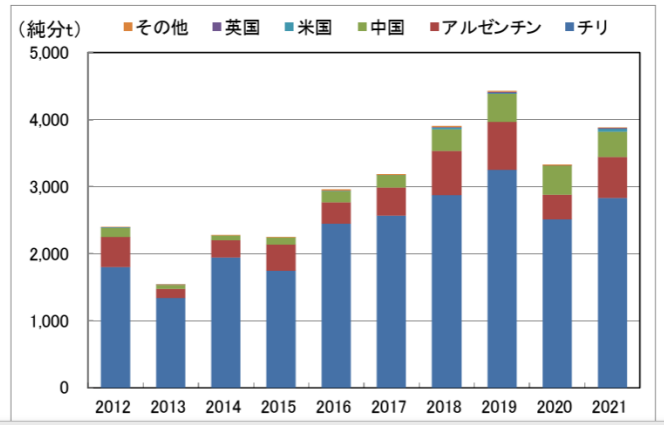


表 3-2-1 炭酸リチウムの輸出入相手国

単位:純分t

		2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	21/20比	構成比
輸入	チリ	1,805	1,344	1,944	1,748	2,452	2,569	2,878	3,255	2,513	2,835	113%	73%
	アルゼンチン	446	131	258	390	319	422	659	711	366	612	167%	16%
	中国	135	59	68	104	162	185	318	424	436	373	86%	10%
	米国	4	0	0	0	7	0	27	7	–	43	–	1%
	英国	–	–	–	–	–	–	8	22	2	10	675%	0%
	その他	3	8	5	8	21	8	12	13	12	4	32%	0%
	合計	2,394	1,543	2,276	2,249	2,962	3,185	3,902	4,431	3,329	3,877	116%	100%
輸出	中国	2	–	0	14	21	26	5	5	7	26	364%	79%
	米国	0	0	0	0	0	0	0	1	–	4	–	11%
	英国	–	–	–	–	–	–	–	5	–	2	–	7%
	台湾	0	0	0	0	0	0	0	0	0	1	646%	2%
	タイ	0	0	0	0	0	0	1	1	1	0	60%	1%
	韓国	–	–	–	–	–	–	–	–	–	0	–	0%
	その他	6	0	0	43	1	1	1	0	0	0	69%	0%
	合計	8	0	1	57	23	27	7	12	8	33	417%	100%

出典:財務省貿易統計



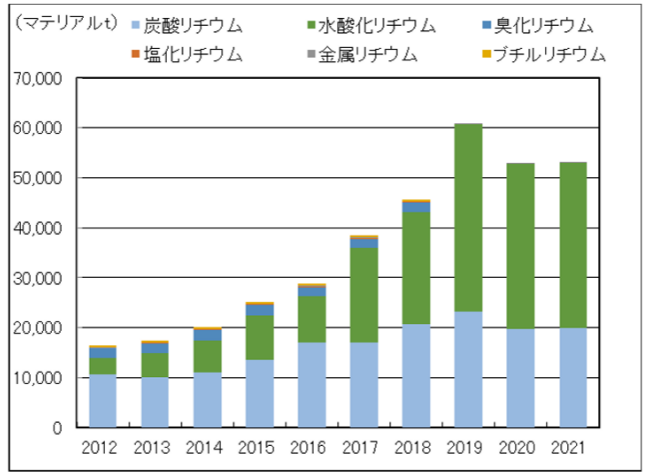
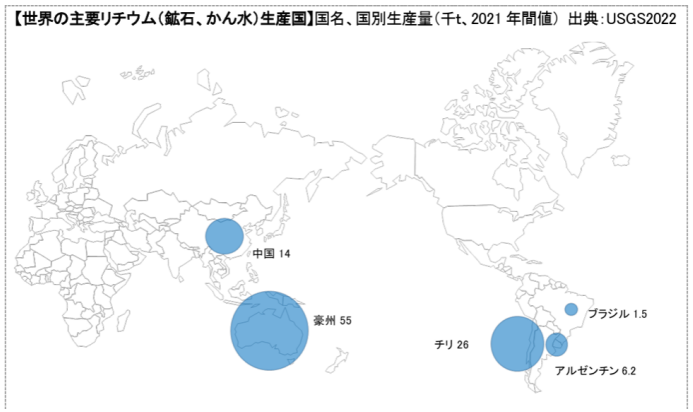


図 2-2-1 リチウムの国内需要



Provides information to identify major producing countries, countries importing to Japan, supply chain flow, etc. for each mineral. Companies can use such information when determining minerals that are of high risk to them (=target of survey)

<Step 2> Identify and assess risks in the supply chain (Examples)

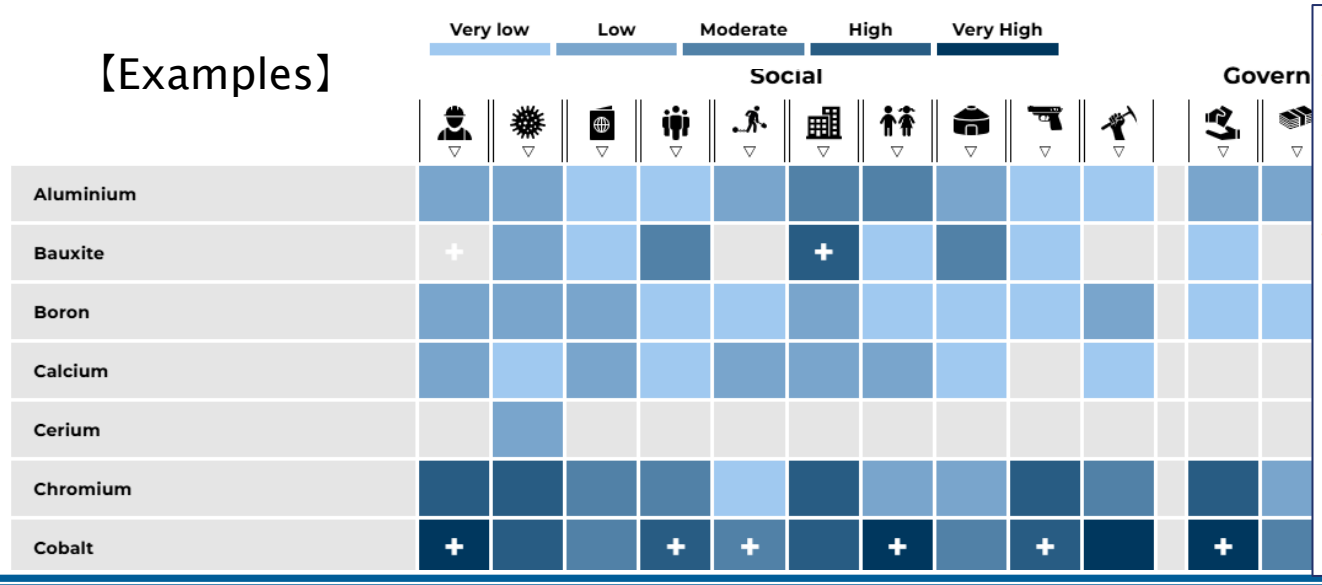
1. Implementation of preliminary surveys: RMI Material Insight

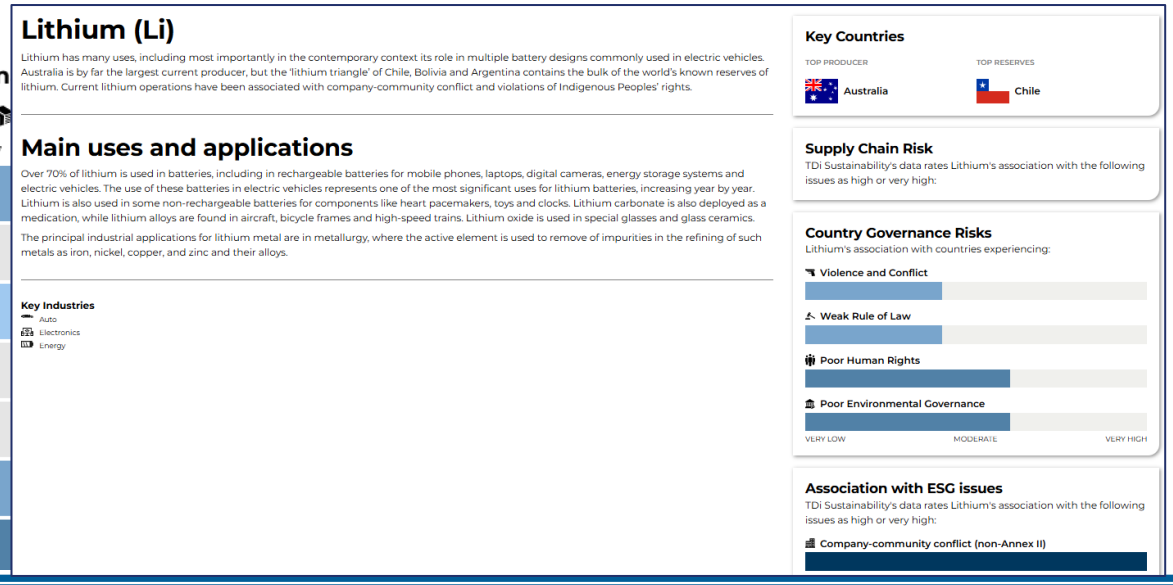
■ Material Insight (https://www.material-insights.org/)

○ Joint platform of RMI/TDI Sustainability:

- **Covered Minerals: 47 types (as of May 2025)** ※ an increase of 2 types from the pervious year (45 types)
  - aluminum, bauxite, boron/borate, calcium, cerium, chrome, cobalt, copper, dysprosium, fluoric, gallium, glass, gold, graphite (natural), iridium, iron, lead, leather (natural), limestone, lithium, magnesium, manganese, coking coal, mica, molybdenum, neodymium, nickel, niobium, palladium, phosphorus, platinum, potassium, rare earth, rhodium, gum, scrap steel, silicon/silica, silicon, silver, steel, talc, tantalum, tin, titanium, tungsten, vanadium, zinc
- Outline of principal use/attribution, main related industries, producing countries and related supply chain risk of each mineral
- Minerals profile and profile for each component (batteries, glass, magnets, printed circuit board) is posted
- Detailed information will be disclosed only to RMI members

【Examples】





<Step 2>　Identify and assess risks in the supply chain (Examples)

2. Selection of surveyed companies and assign priorities to such companies

1) Legal requirements (EU Batteries Regulation, etc.) and request from customers

Give priority to:

- **minerals subject to hard laws**
- **products/minerals frequently required by customers**
- **products/minerals required by major customers**

2) Severity and probability of occurrence of specified ESG risks (use of JOGMEC Material Flow)

Give priority to products/minerals that is considered to have high risk to your company

3) Requirement of stakeholders

Give priority to products/minerals required by monitored index organizations and NGOs

4) Importance to your company and its products

Give priority to products/minerals used in products that have social impact on your company (products that hold a high share/has a large number of customers)

5) Easy to identify smelters/refiners (use of previous survey results, etc.)

Give priority to products/minerals of which information is easily obtained, taking into consideration efforts made by major suppliers

<Step 2> Identify and assess risks in the supply chain (Examples)

3. Preparation of surveys of Smelters

1) List up products/components relating to covered minerals of the survey

① Survey all suppliers (as it is unclear whether products/components contain such minerals or not)

② Narrow down covered products/components by using DB for contained minerals info.

③ Others (use your company's knowledge, if any)

2) Further narrow down in accordance with your company's policy

Presence/absence of orders (delivery), transaction amount, etc.

3) Prepare survey list

Prepare a final survey article list to respond to inquiries from customers and to check collection rate of the survey (list by suppliers, products/components, minerals, etc.)

4) Determine the timing of the survey

Many companies conduct the survey 1 time/year. The timing of the survey varies. (The products fluid period (e.g. Jan.-Dec.) does not need to be taken into consideration if such survey is conducted every year

<Step 2>　Identify and assess risks in the supply chain (Examples)

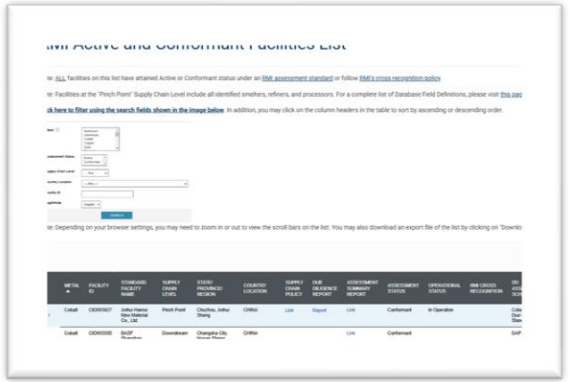
4. Make survey requests

Summarize requests to suppliers in writing and implement such requests
Subject of survey, version/scope of template (Company, Product),
How to handle smelters in the grey area, the previous year's FB (where necessary) , etc.

5. Collection of templates and assessment of risks

Types of risks indicated in templates

- **Smelter List: Name of Smelters (Conformant/Non-conformant), location/country of origin (DRC+9/CAHRAs or not)**
- **Declaration Sheet**
  - **Q1～8: Collection rate, whether all questions are specified or reported**
  - **QA～H: Establishment of policy, conformant request, etc.**



<Glossary>
DRC+9: The Democratic Republic of the Congo (DRC) and its neighboring countries (Angora, Burundi, Central Africa, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia)
CAHRAs: Conflict areas and high-risk areas. Areas in a state of armed conflict, fragile post-conflict areas、as well as areas witnessing weak or non-existing governance and security, such as widespread and systematic violations of international law, including human rights abuses. https://www.cahraslist.net/

Due Diligence 5 steps（Examples）

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<Step 3> Design and implement a strategy to respond to identified risks (Examples)

1. Confirmation of the presence of stipulated risks, establishment of a system to comprehensively evaluate such risks (ranking) and operation thereof
   Each company specifies its evaluation logic
   Categorize risk levels (Low/Middle/High Risk, etc.), and specify corrective measures for each rank
   After aggregation of ranks, implement the corrective measure specified for such rank (make request to supplier for such implementation)
   Request for corrective measures should not be a one-sided demand, companies should work together with suppliers

2. Summary and report of the results of correction measures (due diligence)
   Prepare reports of the aggregate results of collected templates (conformant rate, etc.), distribution of ranks, contents/results of correction request, challenges, etc., and report to the top management through relevant officers
   Post on the company's HP (where necessary)(Step 5)

<Glossary>

Conformant rate: The ratio calculated by analyzing the Smelter information from your company's survey result (Number of RMAP Conformant Smelters/All Eligible Smelters)
RMAP: Responsible Minerals Assurance Process
Conformant: Means to conform with RMAP
Eligible: RMI approved Smelters

Due Diligence 5 steps（Examples）

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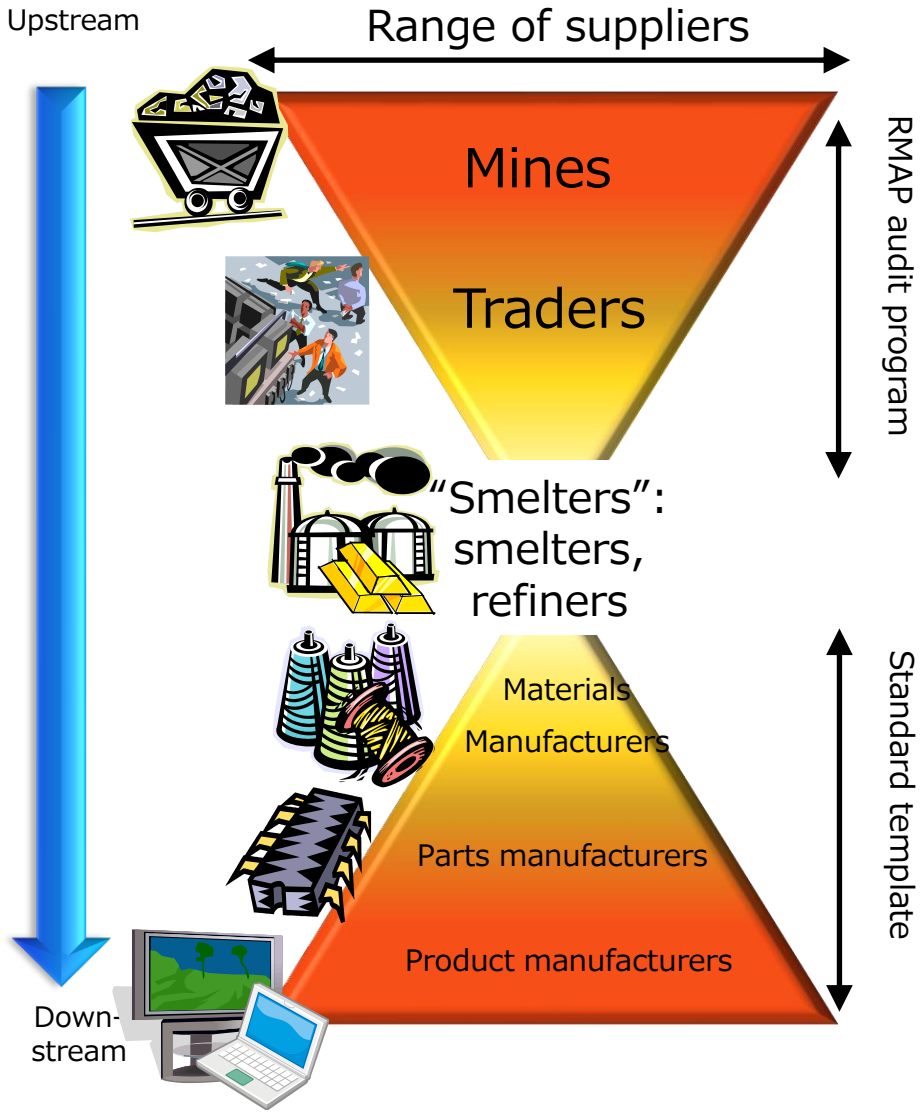
Responsible Minerals Assurance Process（RMAP）



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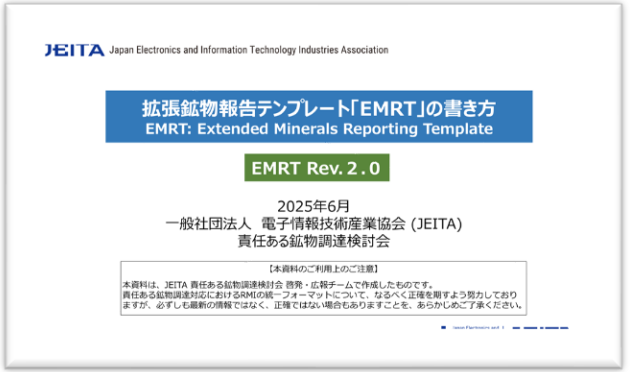
<Step 5> Report annually on supply chain due diligence (Examples)

1. Preparation and issuance of templates (CMRT/EMRT)

   Refer to JEITA Preparation Manual for preparation methods



2. Disclosure of information (on your company's website, etc.)

   Publish/report on your company's website etc. (where possible)

   (Objective, policy, structure, theme, etc.), results of DD (target, conformant rate, etc.), challenges, measures, etc.

   Does not have to clearly demonstrate that no human rights abuse, etc. exist in the supply chain

   What is important is to disclose the following information to stakeholders:

   - **How issues are identified and solved**
   - **Theme and progress of efforts**

<Glossary>

CMRT: Conflict Minerals Reporting Template

EMRT: Extended Minerals Reporting Template

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Reference Material

- **Options that may be reflected in DD requirements**

Options that may be reflected in DD requirements

◎US Uyghur Forced Labor Prevention Act (UFLPA) Executed in Dec. 2021 and entered into force in June 2022

➢ Prohibits, in principle, import of goods mined, produced or manufactured wholly or in part in Xinjiang Uyghur Autonomous Region.

- ✓ **US authorities (CBP) plans to tighten restrictions in the future.**
- ✓ **Customer companies that are the importers of goods into US may request supply chain mapping and DD of raw materials (minerals) in China.**

◎ US OFAC（Office of Foreign Asset Control）Regulations

https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information

- For foreign policy and security purposes, **OFAC** has instituted regulations banning direct and indirect transactions with countries or regions and specific individuals or groups designated by the US and to freeze their assets.

- ✓ **US companies will be affected such as by being banned to deal with sanctioned institutions and individuals.**
- ✓ **It should be noted that even RMI is unable to conduct smelter audit to such covered areas/countries.**
- ✓ **Japanese companies must be careful, as even if a direct/indirect transaction is legal under Japanese Law (FEL, etc.), it may be a compliance violation.**