Conflict Minerals Report

Risk detection table with risk ratings, scores and recommendations

Completed by [*Company name*]

Mandatory fields are noted with an asterisk (*)

Part A – Executive summary

This report presents the findings of a conflict minerals risk assessment conducted for *[Company name]* based on their responses to the Conflict Minerals Reporting Template (**CMRT**) developed by the Responsible Minerals Initiative (RMI) effective on [*Effective Date (*)*]. The assessment utilises a risk scoring methodology to evaluate the company's exposure to conflict minerals risks and its compliance with relevant regulations.

Overall risk classification: [*insert overall risk classification*]
Total risk score: [*insert total points scored*] out of 186 possible points

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Part B – Company information

Question	Answer
Company Name (*)	
Company Unique ID	
Company Unique ID Authority	
Address	
Contact Name (*)	
Email – Contact (*)	
Phone – Contact (*)	
Authoriser (*)	
Title - Authoriser	
Email - Authoriser (*)	
Phone - Authoriser	
Effective Date (*)	

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Part C – Declaration Scope or Class

Question	Answer	Risk indicator	Risk rating	Risk score	Recommendation
Declaration Scope or Class (*)					
Description of Scope (if selected Option A or Option C)		Limited declaration scope	Medium	[**] / 5	If a limited declaration scope is identified, engage with the supplier to understand the reasons for the limitation. Encourage suppliers to expand their scope to cover all relevant products or processes. Provide guidance on how to conduct a comprehensive scope assessment. Consider the potential risks associated with limited scope declarations in your overall supplier risk assessment.
Products this declaration applies to (Option B)					
Total risk score				**[**] / 5**	

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Part D – Questions based on the indicated declaration scope

Question	Answer	Risk indicator	Risk rating	Risk score	Recommendation
Q1: Is any 3TG intentionally added or used in the product(s) or in the production process? (*)		Any mineral selected	Medium	[**] / 5	Conduct a comprehensive audit of your product components and production processes to identify all instances of 3TG mineral usage. Implement a materials tracking system to monitor the presence of these minerals throughout your supply chain. Consider exploring alternative materials or suppliers if 3TG minerals are not essential to your products' functionality.
Q2: Does any 3TG remain in the product(s)? (*)		Any mineral selected	Medium	[**] / 5	
Q3: Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)		Any mineral selected	High	[**] / 10	Develop and implement a rigorous due diligence process to verify the origin of 3TG minerals in your supply chain. Engage with your suppliers to map the entire supply chain back to the smelters and mines. Partner with recognised third-party audit programs to validate smelter practices. Consider joining industry initiatives focused on responsible sourcing from high-risk areas.
Q4: Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)		Any mineral selected	High	[**] / 10	
Q5: Does 100 percent of the 3TG (necessary to the functionality or production of your		No mineral selected	Medium	[**] / 5	Investigate opportunities to increase the use of recycled or scrap sources for 3TG minerals. Engage with suppliers to understand barriers to using recycled materials and work collaboratively to overcome these challenges. Develop

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products) originate from recycled or scrap sources? (*)				incentives for suppliers who can provide 3TG minerals from 100% recycled or scrap sources.
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Less than 100% for any mineral	Medium	[**] / 5	Enhance your supplier engagement strategy to improve CMRT response rates. Provide clear communication about the importance of CMRT reporting and potential consequences of non-compliance. Offer training and resources to help suppliers complete the CMRT accurately. Implement a robust follow-up process for non-responsive suppliers, including escalation procedures.
Q7: Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	No mineral selected	High	[**] / 10	Invest in supply chain mapping tools and processes to identify all smelters in your supply chain. Work closely with your direct suppliers to gather smelter information from their sub-suppliers. Consider joining industry initiatives that maintain databases of known smelters to cross-reference your findings.
Q8: Has all applicable smelter information received by your company been reported in this declaration? (*)	No mineral selected	Medium	[**] / 5	Establish a centralised system for collecting and managing smelter information. Implement data validation checks to ensure completeness and accuracy of reported smelter data. Regularly audit your internal reporting processes to identify and address any gaps in smelter information collection and reporting.
Total risk score			**[**] / 55**	

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Part E – Supply chain survey response rate

Question	Answer	Risk indicator	Risk rating	Risk score	Recommendation
Tantalum (*)		Less than 100%	Medium	[**] / 5	Enhance your supplier engagement strategy to improve CMRT response rates. Provide clear communication about the importance of CMRT reporting and potential consequences of non-compliance. Offer training and resources to help suppliers complete the CMRT accurately. Implement a robust follow-up process for non-responsive suppliers, including escalation procedures.
Tin (*)		Less than 100%	Medium	[**] / 5	Enhance your supplier engagement strategy to improve CMRT response rates. Provide clear communication about the importance of CMRT reporting and potential consequences of non-compliance. Offer training and resources to help suppliers complete the CMRT accurately. Implement a robust follow-up process for non-responsive suppliers,

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				including escalation procedures.
Gold	Less than 100%	Medium	[**] / 5	Enhance your supplier engagement strategy to improve CMRT response rates. Provide clear communication about the importance of CMRT reporting and potential consequences of non-compliance. Offer training and resources to help suppliers complete the CMRT accurately. Implement a robust follow-up process for non-responsive suppliers, including escalation procedures.
Tungsten	Less than 100%	Medium	[**] / 5	Enhance your supplier engagement strategy to improve CMRT response rates. Provide clear communication about the importance of CMRT reporting and potential consequences of non-compliance. Offer training and resources to help suppliers complete the CMRT accurately. Implement a robust follow-up process for non-responsive suppliers, including escalation procedures.

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Total risk score	**[**] / 20**

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Part F – Company level questions

Question	Answer	Risk indicator	Risk rating	Risk score	Recommendation
QA: Have you established a responsible minerals sourcing policy? (*)		"No" selected	High	[**] / 10	Develop a comprehensive responsible minerals sourcing policy that aligns with industry standards and regulatory requirements. Ensure the policy is approved by senior management and integrated into your overall corporate social responsibility strategy. Publish the policy on your company website and communicate it to all stakeholders, including suppliers and customers.
QB: Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)		"No" selected	Medium	[**] / 5	
QC: 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? (*)		"No" selected	High	[**] / 10	Establish clear requirements for your direct suppliers regarding sourcing from validated smelters. Incorporate these requirements into supplier contracts and purchasing terms. Provide resources and support to help suppliers meet these requirements, such as lists of validated smelters and guidance on due diligence practices.
QD: Have you implemented due diligence measures for responsible sourcing? (*)		"No" selected	High	[**] / 10	Implement a robust due diligence framework aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This should include risk assessment, supply chain mapping,

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				supplier engagement, and regular reporting. Assign clear responsibilities within your organisation for overseeing and implementing due diligence measures.
QE: Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	"No" selected	High	[**] / 10	Establish a regular schedule for conducting Conflict Minerals surveys with your relevant suppliers. Develop a standardised survey process, potentially using industry-standard tools like the CMRT. Provide training to your procurement team on administering these surveys and following up on responses.
QF: Do you review due diligence information received from your suppliers against your company’s expectations? (*)	"No" selected	Medium	[**] / 5	Develop a systematic process for reviewing due diligence information received from suppliers. Establish clear criteria for evaluating supplier responses against your company's expectations. Train relevant staff on how to conduct these reviews effectively and consistently.
QG: Does your review process include corrective action management? (*)	"No" selected	Medium	[**] / 5	Implement a formal corrective action management process for addressing issues identified in supplier due diligence reviews. This should include clear procedures for identifying non-conformances, communicating with suppliers, developing corrective action plans, and monitoring progress. Establish timelines for corrective actions and consequences for non-compliance.
QH: Is your company required to file an annual conflict	"No" selected	Low	[**] / 1	Even if not currently required, consider voluntarily preparing an annual conflict minerals disclosure as a best practice. This can help your company stay ahead of

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minerals disclosure? (*)				potential future regulatory requirements and demonstrate commitment to responsible sourcing to stakeholders. Establish internal processes for gathering and verifying the information needed for such a disclosure.
All questions	Inconsistent answers (e.g. "No" to Q1 but "Yes" to Q2 for the same mineral)	High	[**] / 10	Implement robust data validation checks in your CMRT collection and review processes. Develop clear guidelines for suppliers on how to complete the CMRT accurately and consistently. Provide training to both internal staff and suppliers on common data quality issues and how to avoid them. Establish a process for following up on inconsistent or incomplete responses, including offering support to suppliers struggling with data quality.
All questions	High number of "Unknown" responses	Medium	[**] / 5	
All questions	Any mandatory fields left blank	High	[**] / 10	
Total risk score			**[**] / 86**	

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Definitions

Item	Definition
3TG	Tantalum, tin, tungsten, gold
Authoriser	This field identifies the person responsible for the content of the declaration. The authoriser may be a different individual from the contact person. It is not correct to use the words ‘‘same’’ or similar identification to provide the name of the authoriser.
Conflict-Affected and High-Risk Area (CAHRA)	Conflict-affected and high-risk areas are 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 failed states, and widespread and systematic violations of international law, including human rights abuses.
Conflict Mineral	"As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4): CONFLICT MINERAL.—The term ‘‘conflict mineral’’ means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. (available at http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)"
Covered Country(ies)	Covered Country(ies) as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These countries include the Democratic Republic of the Congo and the nine countries with which it shares an internationally recognised border: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia.
Declaration Scope or Class	For the purposes of this template, “scope” describes the applicability of the information provided by the reporting company. The scope may encompass the entirety of a company’s services and/or

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	products, or at a company's discretion, the template may be used to report on a specific product (or products), or, be 'User defined'. The 'User defined' scope selection or class may be used to describe any subset of a company's operation or product portfolio.
Dodd-Frank	2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 ("Dodd-Frank") (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
DRC	Democratic Republic of Congo
Gold (Au) refiner (smelter)	A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations. Refer to the RMAP audit protocol for this metal for a complete description: http://www.responsiblemineralsinitiative.org/smelter-introduction/.
Independent Third-Party Audit Firm	With respect to smelter audits, an "Independent Third-Party Audit Firm" is a private sector organisation competent in evaluating the smelter or refiner's materials traceability against the standards of the RMAP or equivalent audit protocols. To maintain neutrality and impartiality, such organisation and its audit team members must have no conflicts of interest with the auditee.
Intentionally added	"Intentionally added is commonly known as the deliberate use of a substance, or in this case metal, in the formulation of a product where continued presence is desired to provide a specific characteristic, appearance or quality. While the SEC does not define the phrase "intentionally added" in the final rule*, the rule's preamble states: "[W]e agree that being intentionally added, rather than being a naturally-occurring by-product, is a significant factor in determining whether a conflict mineral is ''necessary to the functionality or production'' of a product. This is true regardless of who intentionally added the conflict mineral to the product so long as it is contained in the product. [D]etermining whether a conflict mineral is considered ''necessary'' to a product should not depend on whether the conflict mineral is added directly to the product by

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	the issuer or whether it is added to a component of the product that the issuer receives from a third party. Instead, the issuer should ‘report on the totality of the product and work with suppliers to comply with the requirements.’ Therefore, in determining whether a conflict mineral is ‘‘necessary’’ to a product, an issuer must consider any conflict mineral contained in its product, even if that conflict mineral is only in the product because it was included as part of a component of the product that was manufactured originally by a third party.” *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)"
IPC	IPC (www.IPC.org) is a global industry association based in Bannockburn, Ill., dedicated to the competitive excellence and financial success of its 3,400 member companies which represent all facets of the electronics industry, including design, printed board manufacturing, electronics assembly and test. As a member-driven organisation and leading source for industry standards, training, market research and public policy advocacy, IPC supports programs to meet the needs of an estimated $2.0 trillion global electronics industry. IPC maintains additional offices in Taos, N.M.; Washington, D.C.; Stockholm, Sweden; Moscow, Russia; Bangalore, India; Bangkok, Thailand; and Shanghai, Shenzhen, Chengdu, Suzhou and Beijing, China.
IPC-1755 Responsible Sourcing of Minerals Data Exchange Standard	This IPC standard establishes the requirements for exchanging conflict minerals data between suppliers and their customers. To meet the needs of a broad range of users, this standard provides flexibility in the scope of the products covered within a single declaration. This standard is not a compliance guide.
Necessary for the Functionality of a Product	"The SEC does not provide a formal definition of this phrase in the final rule*, however it provides some guidance: A conflict mineral will be considered to be necessary to its functionality of a product if it meets the following: 1) is intentionally added to the product or any component of the product and is not a naturally-occurring byproduct; 2) is necessary to the product’s generally expected function, use or purpose; and 3) is incorporated for the purpose of

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	ornamentation, decoration, or embellishment, whether the primary purpose of the product is ornamentation or decoration. NOTE: The conflict mineral must be contained in the product to be applicable. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)"
Necessary for the Production of a Product	"The SEC does not provide a formal definition of this phrase in the final rule*; however, it provides some guidance: A conflict mineral will be considered to be necessary to the production of a product when: 1) it is intentionally included in the product's production process, other than if it is included in a tool, machine, or equipment used to produce the product (such as computers or power lines); 2) it is included in the product (MUST be contained in the product to be applicable); and 3) it is necessary to the product. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)"
OECD	Organisation for Economic Co-operation and Development
Product	A company's Product or Finished good is a material or item which has completed the final stage of manufacturing and/or processing and is available for distribution or sale to customers.
RBA	Responsible Business Alliance (www.responsiblebusiness.org)
Recycled or Scrap Sources	Recycled or scrap sources are recycled metals, that are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.
Responsible Minerals Assurance Process (RMAP)	The Responsible Minerals Assurance Process (RMAP) is a process developed by the RBA to enhance company capability to verify the

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	responsible sourcing of metals. Further details of the RMAP can be found here: http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/.
Responsible Minerals Initiative	Founded in 2008 by members of the Responsible Business Alliance, the Responsible Minerals Initiative has grown into one of the most utilised and respected resources for companies addressing conflict minerals issues in their supply chains. Over 360 companies from ten different industries participate in the RMI today, contributing to a range of tools and resources including the Responsible Minerals Assurance Process, the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The RMI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organisations and governments. Additional information is available at http://www.responsiblemineralsinitiative.org.
RMAP Conformant Smelter List	"The Responsible Minerals Assurance Process (RMAP) Conformant Smelter List is a published list of smelters and refiners that have undergone assessment through the RMAP, a program of the Responsible Minerals Initiative (RMI) or industry equivalent program (such as Responsible Jewellery Council or London Bullion Market Association) and have been validated to be in conformance with the protocols. If a smelter or refiner is not on the list, it has either not completed a RMAP assessment or is not in conformance with the RMAP protocol. A list of smelters and refiners which have been validated to be conformant to the RMAP can be found at www.responsiblemineralsinitiative.org. "
SEC	U.S. Securities and Exchange Commission (www.sec.gov)
Smelter	A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots,

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	bars, grains, oxides or salts. The terms “smelter” and “refiner” are used interchangeably throughout various publications.
Smelter Identification Number	A unique identification number the RMI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether or not they have been verified to meet the characteristics of smelters or refiners as defined in the RMAP audit protocols.
Tantalum (Ta) smelter	A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc. Refer to the RMAP audit protocol for this metal for a complete description at: http://www.responsiblemineralsinitiative.org/smelter-introduction/.
Tin (Sn) smelter	Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation. Refer to the RMAP audit protocol for this metal for a complete description: http://www.responsiblemineralsinitiative.org/smelter-introduction/.
Tungsten (W) smelter	A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the RMAP audit protocol for this metal for a complete description: http://www.responsiblemineralsinitiative.org/smelter-introduction/.

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A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the RMAP audit protocol for this metal for a complete description: http://www.responsiblemineralsinitiative.org/smelter-introduction/.

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