# **MAPPING ITSCI INFORMATION & RMAP 2017 EXPECTATIONS**



### **INTRODUCTION**

The ITSCI Programme supports, facilitates, and enables companies to carry out due diligence through our standards and implementation which are <u>fully aligned</u> with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA). While every individual company remains responsible for their own due diligence according to their own circumstances, ITSCI is an upstream joint initiative through which industry members can cooperate regarding due diligence, including by engagement of local stakeholders. ITSCI offers Full Membership to tantalum, tin and tungsten smelters, to other upstream companies up to the mine level, and Associate Membership to downstream companies. ITSCI does not provide assurance or certification. The scope of ITSCI is described online.

As part of our work, ITSCI gathers, collates, evaluates and reports information to ITSCI members according to our information and data release policies. Members receive a range of information from ITSCI related to every Step of the OECD Guidance which they may evaluate and use according to their own determination. Smelters are considered by OECD as the 'pinch point' in 3T supply chains and, if sourcing from CAHRA, are expected to undergo an independent audit according to Step 4 which may be supported by any separate smelter level initiatives. ITSCI aims to provide general guides to ITSCI members regarding how ITSCI information may map to smelter audit requirements of those initiatives.

# **RESPONSIBLE MINERALS ASSURANCE PROCESS (RMAP 2017)**

The Responsible Minerals Initiative (RMI) offers independent third-party assessment of smelter/refiner management systems and sourcing practices to validate conformance with Responsible Minerals Assurance Process (RMAP) standards. The assessment employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement. It is not a material validation assessment.

As a smelter level initiative, RMI offers several audit standards relevant to 3T smelters, including one for tungsten, one for tantalum and tin, and one for tin. In this document we focus on mapping ITSCI information in relation to the RMAP Tin and Tantalum Standard<sup>2</sup> known as RMAP 2017; Publication Date: June 12, 2017 (minor revisions 19 April, 2023). We believe that Annex I of RMAP 2017 for Tungsten<sup>3</sup> is the same as that of Tin and Tantalum although other text may vary between standards. In common with ITSCI, the RMAP assurance process does not result in a material certification nor does it determine that the material at the auditee is conflict-free<sup>4</sup>.

### **GENERAL GUIDE TO RMAP 2017**

In considering how ITSCI information may be used to support smelter due diligence it may be useful to note some general points regarding RMAP 2017.

RMAP confirms that "Auditees shall use good faith and reasonable efforts, as well as integrate progressive and flexible approaches, in their application of the OECD Guidance, including monitoring of emerging risks and incidents in their supply chain(s) and shall take these components into account in their due diligence activities." Lists of expectations and document types are considered examples only.

<sup>&</sup>lt;sup>1</sup> https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/

<sup>&</sup>lt;sup>2</sup> https://www.responsiblemineralsinitiative.org/media/docs/standards/Responsible%20Minerals%20Assurance%20Process Standard SnTa EN.pdf

<sup>&</sup>lt;sup>3</sup> https://www.responsiblemineralsinitiative.org/media/docs/standards/Responsible%20Minerals%20Assurance%20Process Standard W EN.pdf

<sup>&</sup>lt;sup>4</sup> RMAP Tin and Tantalum Standard 2017, section VI Disclaimers

RMAP Table 1 explains the applicability of the 5 Step Framework, noting that <u>in general</u> Steps 1, 2, 4, 5 are applicable to all auditees (with both low and high-risk sources). Further clarification is provided in other sections of the standard explaining that Step 1 chain of custody is not systematically required for low-risk, and parts of Step 2 such as risk identification are only expected for high-risk sources.

RMAP 2017 notes that smelter auditees are expected to complete an RMAP <u>High-Risk Sources Workbook</u> which "specifies components that may be addressed by an Upstream (Assurance) Mechanism and defines under what circumstances such components do not need to be included in the due diligence audit scope". Smelters should refer to, and take account of, the definitions in that Workbook which ITSCI has not accessed.

RMAP Section V explains how smelters may use Upstream (Assurance) Mechanisms, including how the RMAP auditee should "Understand the scope of activities of the upstream assurance mechanism and understand any gaps between the scope of the mechanism's activities and the requirements of the OECD Guidance." Smelters should also refer to that section of RMAP for a full understanding.

#### RMAP 2017 & ITSCI INFORMATION

RMAP 2017 lists in its Annex I example document types which auditors may review in order to <u>test the implementation of the management system</u> of any smelter auditee. The extent of the documentation is stated to be dependent on material category and whether sources are low or high risk;

- Annex I, Table 7 relates to Primary Materials Low-Risk Sourcing
- Annex I, Table 8 relates to Primary Materials High-Risk Sourcing

Both Tables have the same format indicating not only the expectation, but also the level at which documents are expected. In both Tables it is noted that not every document is necessary.

ITSCI provides information on mineral supply chains from <u>CAHRA</u>. We understand that this maps to <u>High-Risk Sourcing per RMAP</u> Table 5 which contains some red-flag criteria although variances on red-flag text is found in other sections of RMAP 2017. Below we indicate when a smelter's use of ITSCI information as part of its management system may be relevant to High-Risk Sourcing expectations. Note that all ITSCI information is evaluated and reported through trained and qualified teams independent of companies.

# ADAPTED FROM RMAP 2017 STANDARD, ANNEX I, TABLE 8: PRIMARY MATERIALS HIGH-RISK SOURCING

The columns on the left are taken directly from RMAP 2017 for reference. Note that text in **bold** is also an expectation for Low-Risk Sourcing and therefore relevant to all primary smelters.

The columns on the right summarise ITSCI's understanding of the RMAP expectation and list various potential sources of ITSCI information for each expectation. ITSCI documents are listed in order of relevance against each expectation as one or more documents may provide relevant information in each case. This list is not exhaustive, other documents may be provided by ITSCI which are not included in the table below although providing information for OECD due diligence. There is no direct relation or mapping between RMAP Table 8 and each of the OECD Steps and there is overlap and flexibility regarding how ITSCI information may be used. Smelters will also have other sources of information and should evaluate all sources as a whole.

RMAP 2017 EXPECTATIONS				МАРЕ	PING TO ITSCI DOCUMENTS
EXPECTATION	LEVEL	DATA POINTS	EXAMPLE DOCUMENT TYPES	ITSCI EXAMPLE DOCUMENT	ITSCI EXAMPLE CONTENT
Context	Country / Area	Political, economic, social and security context of the CAHRA.	<ul><li>UN Reports,</li><li>NGO Reports,</li><li>Governance Assessments,</li><li>Media reports</li></ul>	The expectation is for smelter understanding of general context in each cou or general area to clarify the situation in a CAHRA and consider possible cal of risks. Here, ITSCI understands 'area' to mean area of origin at a countr regional or sub-national mining area such as a province. ITSCI information implementation area may supplement other sources such as public report	
				Monthly reports	Include a section on security and political situation updates, inc. possible risks; on production trends, including changes in economics or market dynamics on the ground; and on stakeholder engagement, inc. multistakeholder meetings.
				• Stories from the field (public)	Include information related to political, economic, social and security context, including by describing logistical, political, social, or economic challenges on the ground and potential improvements.
				ITSCI news or statements (some may be public)	Include ad-hoc news or statements on particular security situations.
				<ul> <li>Annual reports (public)</li> </ul>	Include general updates about context by area.
KnowYou Counterparty (KYC))	Supplier	Identity, type of business relationship and legality of business operations, the ownership (including beneficial ownership) and corporate	Business license,     Business structure and registration,     Individual identification piece(s),     KYC questionnaires,     World-Check or Dow Jones Watchlist and primary sources of sanctions/blacklists such as UN sanctions,     OFAC lists (US	low and high-risk sources as a part of Step 1 (supplier engagement) and Step 2 (identification of suppliers) implementing screenings of suppliers against	

		structure of the supplier and / or in-country exporter, including the names of corporate officers and directors; the business, government, political or military affiliations of the	Government), EU sanctions, Interpol, other relevant Government lists, • Upstream actor visit / audit reports, • Identity of beneficial owners	Membership list (public), including public company summary drafted as part of the company pre-audit process	As part of the company pre-audits process, checks are made on:  Business license  Business structure, registration, address  Identity & nationality of beneficial owners, inc. whether these are listed on UN documents (Sanction, UNGOE), OFAC list, Interpol, public NGO reports, whether they have links to governments or businesses, and whether they have any political or military affiliations.  Management structure and key personnel
		company and officers.			This information is reflected in the company's public summary as appropriate
Country of Origin	Transaction	Type of material; mine and country of mineral origin.	<ul> <li>Customs export record</li> <li>Official (e.g., government-issued) country of origin certificate</li> <li>Official (e.g.,</li> </ul>	The expectation is for confirmation of the country of origin through documents related to supply chain transactions. Information on type of mineral and country or origin is expected for both <a href="low and high-risk">low and high-risk</a> sources as needed for red-flag assessment. In addition, mine visit information (rather than region of origin) is expected for <a href="high-risk">high-risk</a> . ITSCI information can supplement other examples of trading documentation.	
			government-issued) mine license 33 • Purchase order or contract showing mine name • - For ASM sources: Mine visit report from	<ul> <li>Mine baselines (included in shipment reports, only for smelters receiving specific shipments)</li> </ul>	Baselines provide information, for each mine, on location of the mine (within each country), mineral type, ITSCI visits and assessment at and around the mine by field staff independent of any company. Baselines are included in shipment reports which link any smelter to any mine via transaction.
			smelter, supplier or other representative <sup>634</sup>	ITSCI mine lists	Provides list of all ITSCI approved mines, their location (country, territory, and sector level) and whether the mines are active or inactive.
Country of Origin	Country / Area	Validate origin as known production areas and substantiate the output declared by	<ul> <li>Production records from supplier or company</li> <li>Geological surveys,</li> <li>Mine records,</li> <li>Production records of</li> </ul>	that country is a known produ RMAP, understanding production high-risk sourcing relating to	on of whether a specific country or area within cer of the relevant mineral type. In the text of on plausibility is a consideration for both low and DETERMINATION OF THE SCOPE OF THE RISK sessment. ITSCI understands that for high-risk

<sup>&</sup>lt;sup>33</sup> Replaces export record for domestic source.

<sup>&</sup>lt;sup>34</sup> Ensure that assessors are independent from the activity being assessed and free from conflicts of interest. Company assessors must commit to reporting truthfully and accurately and upholding the highest professional ethical standards and exercise due professional care.

		the source / mine.  Quantity, dates and method of extraction (ASM or LSM).	traceability / chain of custody program	dates and method of extractions smelters are unable to make an against their individual mineral	ectation is to also evaluate mine source, quantity, on per OECD Step 1C (traceability). Noting that exact direct comparison of mine production data all receipts since production of a mine may be rs. Smelters are able to review relevant incidents
				<ul> <li>Mine baselines (included in shipment reports, only for smelters receiving specific shipments)</li> </ul>	Include type of minerals, method of extraction, and estimated production quantity of minerals for each mine.
				Incident summaries	Include incidents which have been opened to record anomalies of production or origin which may not be substantiated.
				Due Diligence list	Provides an indication of mines or mine companies which may benefit from further evaluation by companies to substantiate production.
				Monthly reports	Include a section on production, including trends and causes of changes, for each mineral type, including due to economic, geological, meteorological, seasonal or other factors.
				Quarterly data summaries	Include aggregated production records per implementation area, disaggregated per country, territory/district/commune, and mineral type.
Chain of Custody / Traceability	Transaction	Identification of all location(s) in the supply chain including mine site, trading house, exporter and processors.	Traceability:  Traceability reports,  Reference / shipment numbers  Domestic Transportation:  Trucking	This expectation is for chain of custody information at a transactional level. This is not systematically required for <a href="low-risk">low-risk</a> sources although international transport route and similar information is relevant for all. The expectation is more formal for <a href="high-risk">high-risk</a> sources for which smelters should in addition identify the <a href="location">location</a> of activities for all tiers in the supply chain in the high-risk country,	

		For each independent section of the domestic and international transportation route, physical location of origin of the shipment; physical location of final destination of the shipment, description of the material (type and weight) and date of physical transportation /arrival date of the material.	<ul> <li>Warehouse receipts</li> <li>Contract showing transporter name</li> <li>Invoices from appointed transport agent</li> </ul>	Shipment reports (only for smelters receiving specific shipments)	<ul> <li>Shipment reports include:</li> <li>Reference number(s) of the associated shipments</li> <li>List of associated tags,</li> <li>List of all associated mines of origin</li> <li>Weights and type of minerals</li> <li>In-country locations where minerals are consolidated and exported</li> <li>Transport routes and method, inc. name of transporters.</li> </ul>
Legality	Supplier / Transaction	All taxes, fees or royalties paid to government for the purposes of extraction, trade, transport and export of minerals; Any other payments made to govern-mental officials for those same purposes; All taxes and any other payments made to public or private security forces or other armed groups at all points in the supply chain from extraction onwards	<ul> <li>Customs export record;</li> <li>Supplier or in-country exporter financial reports;</li> <li>Contracts with public or private security forces</li> </ul>	<u>risk</u> areas per Step 1.C (traceab	nd payment of taxes, fees and royalties in high- ility) whether legal payments to government or yment to other armed groups. The example mented by ITSCI information.  Include information on:  • payments and/or risks associated with non- payment of taxes, fees or royalties made to state services  • payments made to public and private security forces, including associated potential risks  Include incidents that relate to whether all taxes, fees or royalties are paid to government for the purpose of extraction, trade, transport and export, reporting where this was not the case. Possible incidents include:  • Non-payment of taxes, fees, or royalties to state services  • Payments to private or public security forces  • Direct or indirect support to non-state armed groups  • Corruption or bribery

				ITSCI Audit reports     C form declarations	Include checks on the payment of taxes, support to EITI principles, risks of support to state or non-state armed groups or private security forces. Also include checks on contracts with suppliers and whether these include specific clauses on due diligence obligations for the supplier.  The forms include details on:  • Date of export  • ITSCI shipment number  • Mineral type  • Reference number of Certificate of Origin  • Declaration from exporter that all government taxes/royalties have been paid  • Declaration from exporter on state or non-state armed groups involved
Supply Chain Mapping	Supplier	Locations where minerals are consolidated, traded, processed or upgraded; the identification of all	<ul> <li>Supply chain map,</li> <li>Traceability reports,</li> <li>Contracts / agreements,</li> <li>Mine site declarations or visit reports</li> </ul>	This expectation is for mapping of <u>locations</u> of mineral activities, actors and transport routes. Location of activities are covered in 'Chain of custody/traceability (column 'expectation') and 'Transaction' (column 'level') with the same ITSCI document listed there applying here, i.e., ITSCI shipment reports. This expectation further focuses on supplier level information identifying actors and extends to transport routes (between suppliers).	
		upstream intermediaries, consolidators or other actors in the upstream supply chain; transportation routes	identifying actors in the supply chain.	Shipment reports, inc.     mine baselines (only for     smelters receiving specific     shipments)	Include:  Reference number(s) of the associated shipments  List of associated tags  List of all associated mines of origin  Weights and type of minerals  In-country locations where minerals are consolidated and exported  Transport routes and method, inc. name of transporters.
				Mine baselines (only for smelters receiving specific shipments)	<ul> <li>Include, for each mine:</li> <li>Names of cooperatives and local negociants</li> <li>In-country mineral transport routes inc. method of transport</li> <li>List of other actors such as state services, security forces</li> </ul>

Risk Assessment	supply chain. Issues included:  • Presence and / or involvement of non-	on conditions in the supply chain. Issues included: • Presence and / or involvement of nonstate armed groups35	<ul> <li>Upstream actor visit or audit reports,</li> <li>Incident monitoring reports,</li> <li>Involvement of nonstate armed groups35</li> <li>Upstream actor visit or audit reports,</li> <li>Incident monitoring reports,</li> <li>NGO or other stakeholder reports.</li> </ul>	ITSCI notes that the responsibility to conduct company risk assessment lies with individual companies as explained in RMAP text; the auditee shall assess presence and severity of risks in the supply chain. Nevertheless, ITSCI provides incidents and other information on these data points which reflect the OECD Annex II risks which companies can use as a source of information for their country/area level risk assessment. ITSCI information supplements other sources of information such as public reports or data gathered by smelters.	
			Incident summaries	Include incidents related to corruption, security, human rights, and involved actors covering all OECD Annex II risks including those listed in the data points.	
		<ul> <li>Presence and role of public or private</li> </ul>		Level-1 Alerts	Ad-hoc alerts with information on Level-1 risks, including on OECD Annex II risks.
	money laundering or non-payment of taxes, fees and	Occurrence of bribery, money laundering or non-payment of		Monthly reports	Include a section on security and on incidents, including on OECD Annex II risks.
Risk Assessment	isk Supplier / Name of actors	<ul> <li>On-the-ground assessment team,</li> <li>Upstream actor visit or audit reports,</li> <li>Upstream risk assessment lies with individual companies (including national laws and other listed frameworks). ITSCI provides ground assessment team of individuals who are regular standards, procedures, and due diligence overall. They facilitating stakeholder meetings, identifying risks, making the risk mitigation, and supporting the implementation of mitigation is for risk assessment on suppliers (or risk assessment or risk assessment on suppliers (or risk assessment or risk assessment or risk assessment or risk assessment or risk assessment or</li></ul>	data points). Responsibility to conduct company ridual companies (including assessment against frameworks). ITSCI provides an extensive on-the-individuals who are regularly trained on ITSCI ue diligence overall. They play a key role in its, identifying risks, making recommendations for the implementation of mitigation actions. ITSCI		
			regulations, OECD Guidelines, core Human Rights conventions, humanitarian law	Incident summaries	Include the exact location of the incident, list of responsible actors, other involved actors, risk category and level, description of the incidents, description of taken actions, recommendations of mitigation actions. It also includes dates of discussion at multi-stakeholder committee meetings and dates of incidents are opened, updated and closed.
				Level-1 Alerts	Ad hoc alerts for Level-1 (highest level) incidents including description of the risks and

					measures taken.
				ITSCI audit reports	Information on what risk assessment and mitigation a supplier has conducted, covering all OECD Annex II risks.
				Monthly reports	Include a section on security and incidents, with information on mitigation actions taken to address specific incidents.
Risk Mitigation		This expectation is for risk mitigation on suppliers (immediate steps of mitigation being addressed in the row above). ITSCI provides an extensive on-the-ground assessment team of individuals who are regularly trained on ITSCI standards, procedures, and due diligence overall. They play a key role in facilitating stakeholder meetings, identifying risks, making recommendations for risk mitigation, and supporting the implementation of mitigation actions. ITSCI information supplement other available information.			
		Grievance     Mechanisms and     tracking/responding     to supply chain	Incident summaries	Include the exact location of the incident, list of responsible actors, other involved actors, risk category and level, description of the incidents, description of taken actions, information on discussion at multi-stakeholder committee meetings, recommendations of mitigation actions. It also includes dates of discussion at multi-stakeholder committee meetings and dates of incidents are opened, updated and closed.	
				ITSCI audit reports	Include information on a supplier's performance with regard to risk mitigation in line with the recommendations of the OECD Guidance.
				Whistleblowing mechanism	ITSCI's whistleblowing mechanism is available to any member with <u>all details provided on the ITSCI website</u> . Whistleblowing reports that are relevant or potentially relevant to the scope of ITSCI are recorded and processed through the incident system.
				Annual incident and outcome review (public)	Includes information on outcomes of risk mitigation following support and recommendations made by ITSCI teams to stakeholders for actions appropriate for OECD

				Quarterly Overview (public)	aligned mitigation.  Include information on risks and on local multistakeholder committees.
Risk Management	Auditee	Evidence of ongoing monitoring of risks	<ul> <li>Risk management plan and strategy</li> <li>Reports to senior management,</li> <li>Meeting notes,</li> </ul>	This expectation is at the level of the <u>smelter auditee</u> and relates to risk management. ITSCI does not conduct ITSCI audits at the smelter as these are performed by RMAP or other equivalent assurance processes. Some incidents relevant to smelters may be recorded by ITSCI, evaluated and progress recorded in the same way as other incidents.	
			<ul> <li>Internal memos / correspondence,</li> <li>Notice of suspension / discontinuation of contracts / agreements</li> </ul>	Incident summaries	Include the exact location of the incident, list of responsible actors, other involved actors, risk category and level, description of the incidents, description of taken actions, information on discussion at multi-stakeholder committee meetings, recommendations of mitigation actions.

# **FINAL NOTE**

If ITSCI member smelters do not receive regular communication and information from ITSCI, we advise you to contact us to confirm or update the company's contact details. ITSCI sends quarterly reminders to companies to confirm a company's information is up to date. ITSCI also sends monthly reminders to smelters regarding requests for shipment reports. As noted in RMAP, smelters should review information from ITSCI, whether received through member communication or on our website, to enable you to (where possible) actively participate in risk mitigation, including by following-up with your own suppliers.

# **CONTACT DETAILS**

For further information, please contact the ITSCI Secretariat, <a href="mailto:itsci@internationaltin.org">itsci@internationaltin.org</a>.