RMI Audit Firm and Auditor Approval Process

About this Document
This document provides instructions for auditors and audit firms to become and remain approved as independent third party auditors for the Responsible Minerals Assurance Process (RMAP). Interested parties should read this document in its entirety and submit all related forms to rmi@responsiblebusiness.org. The Responsible Minerals Initiative (RMI) reserves the right to revise this document from time to time as deemed appropriate.

All questions should be directed to rmi@responsiblebusiness.org.

About the RMAP
The flagship program of the Responsible Minerals Initiative (RMI), the Responsible Minerals Assurance Process (RMAP) takes a unique approach to helping companies make informed choices about responsible sourcing of minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party audit to identify smelters and refiners that have systems in place to source materials responsibly. Companies can then use this information to inform their sourcing choices.

The audit standard is developed according to global standards including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the relevant country legislation, such as the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, and the European Union Conflict Minerals Regulation.

Legal Disclaimer
[Legal Disclaimer: No guarantee, warranty or representation is made as to the accuracy or completeness of this document and other documents or information sources referenced in this document. Use of this document is not intended to and does not replace, contravene or otherwise alter the requirements of any applicable national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Use of this document by non-members is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights against the RMAP and/or its Members or signatories. This document does not create, establish, or recognize any legally enforceable obligations of the RMI and/or its. Non-members shall have no legal cause of action against the RMI and/or its Members for failure to comply with this document.]
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Introduction

Objectives
The purpose of this document is to ensure the qualification and credibility and conformance of both Audit Firms and Individual Auditors when auditing against RMI’s Responsible Minerals Assurance Process (RMAP, formerly RMAP) Standards for Tin, Tantalum, Tungsten and Gold. The RMAP seeks to verify that all auditors are experienced, hold the requisite expertise, and undergo the appropriate amount of training in order to conduct quality independent audits. The core principles for Qualified Audit Firms and Qualified Auditors are: ethical conduct; fair presentation; due professional care; independence; and integrity. RMI strives to maintain these criteria in each individual audit.

Qualification Process

Initial Process
RMI may open Audit firm qualification process as needed, depending on the audit volume and currently approved audit firm capacity.

The RMI will collect expressions of interest between periods of the Qualifications process:

- 3 months before a new Qualification Process decision the RMI will announce the opening of a new Qualification Process on the RMI webpage.
- 2 months before the new Qualification Process decisions the RMI will write to all third party audit firms which has expressed interest in qualifying for the Qualification Program.
- 1 month before the new Qualification Process decisions the RMI will close the application process.
- 1 week before the new Qualification Process decisions the RMAP will provide the applications and related scores to the Independent Review Committee for decision, including the copy of the request for submission of RMAP Qualification.
- Qualifying Firms will be granted provisional approval for the 6 month period, during which time, they will be evaluated on the implementation and integration of the RMAP program into their policies and processes, and auditor performance.
- Full approval will be granted upon evaluation of audit firms and individual auditor preparedness, including review of the firms’ RMAP-specific SOPs, other relevant policies, internal training program, as well as feedback to individual auditors from audit program manager, Audit Review Committee (ARC), auditees, on audit methodology/technique and associated audit reports. As part of the evaluation QPM will conduct at least one shadow audit per firm.
- Results will be published on RMI website.

Eligibility
Audit Firms who wish to apply to be approved must demonstrate that they are accredited by another accreditation body on the company level:

- Current ISO accreditation from various recognized accreditation councils for ISO management system certification schemes, such as ISO 17021:2011; firms not currently holding ISO accreditation, need to demonstrate that they have systems in place to meet the requirements and that they are working to attain an accreditation by January 1, 2020.
Additionally, audit firms, especially those without prior RMAP experience, will be asked to provide evidence of:

- Current approval by any of the RMI cross-recognized standards (such as RJC, LBMA), or similar, as the approved/accredited auditing body
- Any other relevant and current accreditations, certifications or memberships held

Individual auditors who are employees or contractors* of an approved audit firm also have to go through an application and approval process. Each individual auditor of an approved firm must be assessed and approved before they can conduct their first RMAP audit.

*While contract auditors are allowed, approved audit firms cannot sub-contract an assignment out to a non-approved audit firm.

Quality Control
Audit firms must demonstrate that they have a robust quality control system in place to assure auditing and reporting quality. Quality control program should include, but not limited to, these elements:

- Independent quality review staff
- Internal RMAP training program
- Independent quality assurance process
- Improvement process for account management
- Pre-audit preparation/document review and post-audit report/CAP review processes
- A registered ISO 9000 or TL 9000 Qualification Statement, or equivalent
- Provide a listing of any quality awards your firm has received

RMI will also conduct periodic shadow audits to witness RMAP assessments executed by approved firms for quality control processes on as needed basis.

Application
Applicants must complete the RMAP Audit Firm Approval Application form, fill out the Approved Auditor List as well as the Auditor Approval Application form for each auditor on the List. Applications must be completed in English.

Applicants are expected to provide supporting evidence for any claims made on the application forms. All supporting evidence documentation should be submitted at the time of the application for the whole audit firm and for individual auditor applicants, as well as for any additional auditors applying throughout the duration of the audit firm approval period.

Individual applicants must also provide a current Curriculum Vitae (CV) for review, in addition to the audit logs, shadow audit logs, auditor training and certification/accreditation certificates.

Submitting an Application
Applications and supplementary documentation should be emailed to rmi@responsiblebusiness.org for review. The RMI will acknowledge receipt of all submitted applications.
Confidentiality
Any information submitted by applicants will be kept strictly confidential by the RMI and will be used solely for the purposes of assessing the applicant’s application for Approval.

Assessment – Qualified Audit Firms

Assessment Process
The RMI will review the applications for approval and select audit firms that meet the requirements outlined in this document. The Qualification decision will be based upon the total points allocated against the minimum requirements. RMI will then recommend selected audit firms for approval by the Audit Review Committee (ARC). ARC is involved in the approval process for each audit firm to ensure impartiality and correct procedures are followed.

Each of the minimum requirement criteria discussed below is awarded a maximum of 5 points with a total maximum for Qualification of 45. The minimum points required for Qualification is 31 out of a maximum, with no individual section below 3 out of 5.

- Core Principles = 5 points
- Subject Matter Expertise = 5 points
- Audit firm competence and experience = 5 points
- Audit firm experience in minerals traceability, 1 point for each year up to 5 points
- Auditor Training = 5 points
- Quality Control = 5 points
- Customer Satisfaction = 5 points
- Ethics and Integrity Policy/Procedures = 5 points
- Root Cause and Continuous Improvement Approach = 5 points

Total awardable points = 45

Final award of the Qualification will be based on demand needs identified before the Qualification Process. If more audit firms than the required demand needs qualify then the audit firms with the highest points will be qualified first, then second highest until the maximum number of Qualified Audits is reach matching the identified demand needs.

Basic Requirements

Independence
The Qualified Audit firm must have complete financial and other independence from the Auditee. In particular, the auditing body shall not provide services for the Auditee related to the design, establishment or implementation of the Auditee’s supply chain practice for a period of at least 24 months prior to the engagement.

Conflict of Interest
The Qualified Audit firm and the Audit team will not have any actual or perceived conflicts of interest that might compromise the third-party audit process. It is essential that all parties, including approved audit firms for the RMAP, practice good communication and disclose potential conflicts of interest.
Conflict of Interest shall mean:

- Any material financial interest by the audit firm or any immediate family member of the firm in the Auditee.
- Any employee or immediate family member of the audit firm serving in any capacity at the Auditee such as: director, officer, employee, agent, partner, associate, trustee, consultant, or similar role.
- Any acceptance of any gifts, gratuities, or entertainment.
- Any business arrangement, which would result in the audit firm checking its own work.

The Auditor must disclose to RMAP any of the above circumstances as soon as they are recognized or known. The Auditor shall not accept any Audits where there may be a possibility of a conflict of interest, which might prevent the Auditor from properly performing its duties within the standards of the RMAP.

RMAP reserves the right to evaluate and take action on any information that comes into its possession suggesting that the “state of mind” of the auditor may not have been sufficiently independent to conduct the audit.

In recognition of the possibility that approved audit firms may seek to provide consulting services to potential Qualification Auditees, the program will institute the following practices:

- The Auditor shall report to RMAP the names and CID numbers of any Auditees where they perform advisory services, in advance of such activities being performed, in addition to noting the month and year of the service.
- If a Qualification Audit is performed, the Auditor shall not use the privileged and confidential information obtained, including key contact information, to sell other services to the Auditee.
- If Qualification or consultancy is performed for the Auditee, then the Auditor is excluded from performing a Qualification Audit for the next audit period.
- For large organizations, it is possible for two separate and independent entities within the organization to perform such services. In this case, a letter from the country manager or corporate legal counsel is required to ensure that there is no conflict of interest between the Qualification Audit and other services performed. The letter shall specifically state the persons involved in previous services and the persons assigned in the Qualification Audit and the clear proof that these belong to separate and independent entities within the organization.

Institutional Capacity

The Qualified Audit firm must have adequate organizational capacities including:

- A robust system of quality control, including minimum requirements for independence, conflicts of interest, ethics and audit quality control reviews to be followed; and
- The capacity to process appeals and/or handle complaints.

Core Principles and Competencies

The Qualified Audit firm must ensure that any individual or group of Auditors carrying out a third-party audit is independent from the Auditee. In addition, the individual or group of Auditors must collectively possess the skills, knowledge and experience required to competently perform the assurance engagement.
### Minimum Requirement Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Description</th>
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</table>
| **Subject Matter Expertise** | Knowledge of and experience in the 3TG industry  
Knowledge of and experience in supply chain due diligence principles, procedures and techniques  
Understanding of 3TG procurement practices and supply chains  
Knowledge of and experience in the implementation of the Qualification Audit and other initiatives to increase transparency and due diligence in the 3TG supply chain and, in particular, knowledge of the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas  
Knowledge of local context, including social, economic, political and cultural considerations, of conflict-affected and/or high-risk areas |
| **Audit firm competence and experience** | Key personnel and relevant experience  
External Qualifications relating to auditing activities  
Professional audit organizations your firm subscribes to  
Customer Qualifications held by your firm relating to audit activity  
Audit firm RMI involvement  
Length of time performing auditing  
Audits performed in each of the last three years  
Specific expertise in Qualification Auditing  
Expertise in auditing mining and minerals supply chains  
List any industry consortia your company has performed audits for over the last three years |
| **Auditor Capacity and Training** | The total number of audit personnel employed globally  
The number of contractors versus regular employees by country  
Minimum auditor requirements upon hire  
Minimum training requirements for Auditors  
Minimum continuous professional adult education program  
Minimum auditor Qualification level |
| **Contracting** | Contracting of individual auditors is allowed. Contractor must fulfil same criteria as full-time auditors employed by the Qualified Audit Firm and shall be specifically approved by the RMAP  
A contract shall be in place with the contractor and the Qualified Audit Firm which will include all aspects of the contract/agreement between RMAP and the Qualified Audit Firm  
Responsibility of contractors and Qualified Audit Firm to maintain contractor qualifications under RMAP  
There is a process within the Qualified Audit Firm to assure the quality service of the contractor |
### Quality Control

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent quality review staff</td>
<td></td>
</tr>
<tr>
<td>Independent quality assurance process</td>
<td></td>
</tr>
<tr>
<td>Improvement process for account management</td>
<td></td>
</tr>
<tr>
<td>A registered ISO 9000 or TL 9000 Qualification Statement</td>
<td></td>
</tr>
<tr>
<td>Provide a listing of any quality awards your firm has received</td>
<td></td>
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</tbody>
</table>

### Customer Satisfaction

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Details</th>
</tr>
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<tbody>
<tr>
<td>Process for receiving, tracking, and processing customer feedback on your performance.</td>
<td></td>
</tr>
<tr>
<td>Process for obtaining feedback from audited facilities regarding the performance of your audit staff</td>
<td></td>
</tr>
<tr>
<td>Corrective action process to prevent reoccurrence of customer complaint conditions</td>
<td></td>
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</tbody>
</table>

### Ethics and Integrity Policy/Procedures

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>Current ownership shall not be linked, affiliated or have financial interests in any component of the Smelter or Refiner supply chain</td>
<td></td>
</tr>
<tr>
<td>Company’s business ethics policy</td>
<td></td>
</tr>
<tr>
<td>Process to detect and minimize unethical behavior of auditors and/or personnel in facilities which your firm has audited</td>
<td></td>
</tr>
<tr>
<td>Process for the disbarring of an auditor</td>
<td></td>
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</tbody>
</table>

### Root Cause and Continuous Improvement Approach

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Details</th>
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<tbody>
<tr>
<td>At the present time, the RMAP has not included this section in the Qualified Audit firm Scope of Work. Answers to this section will provide the Group with insight into your capabilities for potential future consideration</td>
<td></td>
</tr>
<tr>
<td>Describe your process for performing root cause analysis on an audited facility’s noncompliance to audit criteria</td>
<td></td>
</tr>
<tr>
<td>Describe your process to evaluate audited facility’s corrective and preventive action plans</td>
<td></td>
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<tr>
<td>Describe your process to verify completion of corrective actions and closure of noncompliance</td>
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</tbody>
</table>

### Assessment – Qualified Auditors

**Assessment Process**

The decision to qualify an auditor for RMAP will be done by the RMAP. The Qualification decision will be based upon the total points allocated against the minimum requirements.

Each of the minimum requirement criteria in section below is awarded points with a total maximum for Qualification of 30. The minimum points required for Qualification is 21 out of the maximum with no score lower than 1 out of a possible 2 points for each criteria.

- Knowledge of the minerals supply chains and trading = 2 points
- Knowledge of specific smelter operations= 2 points
- Knowledge of applicable laws to RMI = 2 points
- Knowledge of materials balance = 2 points
- Knowledge of chain of custody = 2 points
- Audit management and execution (fulltime auditing experience 1 year minimum) = 2 points
- Conduct a physical inspection of facilities and grounds = 2 points
- Conduct the audit without drawing excessive attention or disrupting business processes = 2 points
- Determine credibility of information, whether the factory is adhering to policies and procedures, and verify allegations derived from other sources = 2 points
- Able to keep relevant information confidential and to comply with any confidentiality agreements = 2 points
- Notify the Lead Auditor of issues affecting the ability of the Audit team to perform the Audit (e.g. lack of cooperation of facility management; records falsification, …) = 2 points
- Obtaining and synthesizing of information = 2 points
- Analytical skills = 2 points
- Report fully on information gathered through written report in line with international good practice = 2 points
- Extensive communication and interview skills = 2 points

Total awardable points = 30

Qualified Lead Auditors

Required knowledge and skills

Qualified Lead Auditors are responsible for ensuring that the Qualification Audit is conducted in accordance with the Audit process, guidelines, Protocols, and quality expectations defined in this Manual. They are also responsible for soliciting suggestions for improving the overall Qualification Program from Audit team members and for submitting suggestions and recommendations to the RMAN.

The minimum required experience, knowledge and skills are:

- Successfully complete at least 3 audits as a team member for the specific metal protocol under the supervision of a Lead Auditor
- Knowledge of the minerals supply chains and trading
- Knowledge of specific smelter operations
- Knowledge of applicable laws to RMI
- Knowledge of materials balance
- Knowledge of chain of custody
- Audit management and execution (demonstrate minimum of one year full time social/management systems auditing experience)
- Scope and plan an audit, including but not limited to launching the audit request, managing pre-audit activities, and scoping of audit and audit criteria
- Form and manage the Audit team
- Establish the Audit agenda and manage onsite time efficiently
• Lead the opening and closing meetings
• Conduct a physical inspection of facilities and grounds
• Conduct the audit without drawing excessive attention or disrupting business processes.
• Determine credibility of information, whether the factory is adhering to policies and procedures, and verify allegations derived from other sources
• Able to keep relevant information confidential and to comply with any confidentiality agreements
• Able to secure management buy-in to next steps, as/when required
• Advise on ways to resolve noncompliance in practical ways that meet legal, supra-legal and other (e.g. OECD) and RMAP requirements
• Notify the RMAP of issues affecting the ability of the Audit team to perform the Audit (e.g. lack of cooperation of facility management; records falsification, etc.)
• Obtaining and synthesizing of information
• Analytical skills
• Report fully on information gathered through written report in line with international good practice
• Extensive communication and interview skills
• Strong planning, organizational, and time management skills

Desired personal behaviors
• Maintenance of a professional demeanor
• Ability to take a leadership role, particularly in problematic or unanticipated situations.
• Ability to make decisions based on objective and verifiable evidence
• Ability to deal sensitively and discreetly with people from different backgrounds and to make them feel at ease
• Ability to adapt communications to the situation
• Ability to probe effectively and discern risk
• Ability to lead discussions and to handle issues of conflict as they arise while maintaining composure and showing respect for all parties
• Avoidance of conflicts of interest
• Avoidance of gifts, bribes, and favors
• Perceptiveness and tenaciousness, with strong investigative and analytical skills
• Honesty, trustworthiness and diplomacy, and ability to maintain independence from special interests
• Open-mindedness, reasonableness, and objectivity
• Self-reliance, with ability to interact effectively with others and share data to arrive at mutual conclusions

Audit Team Members
Required knowledge and skills
Qualified Auditors are responsible for ensuring that they conduct the Qualification Audit in accordance with the Audit processes, guidelines, Protocols, and quality expectations outlined in
this manual. They are also responsible for providing suggestions for improving the overall Audit program directly to the Lead Auditor.

The minimum required knowledge and skills are:

- Knowledge of the minerals supply chains and trading
- Knowledge of specific smelter operations
- Knowledge of applicable laws to RMI
- Knowledge of materials balance
- Knowledge of chain of custody
- Audit management and execution
- Conduct a physical inspection of facilities and grounds
- Conduct the audit without drawing excessive attention or disrupting business processes
- Determine credibility of information, whether the factory is adhering to policies and procedures, and verify allegations derived from other sources
- Able to keep relevant information confidential and to comply with any confidentiality agreements
- Notify the Lead Auditor of issues affecting the ability of the Audit team to perform the Audit (e.g. lack of cooperation of facility management; records falsification, …)
- Obtaining and synthesizing of information
- Analytical skills
- Report fully on information gathered through written report in line with international good practice
- Extensive communication and interview skills

Desired personal behaviors

- Maintenance of a professional demeanor
- Ability to adapt in problematic or unanticipated situations
- Ability to make decisions based on objective and verifiable evidence
- Ability to deal sensitively and discreetly with people from different backgrounds and to make them feel at ease
- Ability to adapt communications to the situation
- Ability to probe effectively and discern risk
- Avoidance of conflicts of interest
- Avoidance of gifts, bribes, and favors
- Perceptiveness and tenaciousness, with strong investigative and analytical skills
- Honesty, trustworthiness and diplomacy, and ability to maintain independence from special interests
- Open-mindedness, reasonableness, and objectivity
- Self-reliance, with ability to interact effectively with others and share data to arrive at mutual conclusions
Qualified Contract Auditors

The Audit Team may be composed of contractor staff so long as the following conditions are met:

<table>
<thead>
<tr>
<th>Auditor Role</th>
<th>Criteria</th>
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<tbody>
<tr>
<td>Audit Team Member</td>
<td>Contractor is familiar with the Qualification Audit criteria and the region, country, and industry of the Auditee</td>
</tr>
<tr>
<td></td>
<td>Contractor has signed a non-disclosure agreement with the audit firm</td>
</tr>
<tr>
<td></td>
<td>Contractor has received training in business ethics by the audit firm</td>
</tr>
<tr>
<td></td>
<td>Contractor has a particular skill, such as language or technical knowledge, not otherwise available within the firm</td>
</tr>
<tr>
<td></td>
<td>Contractor has standard auditor qualifications including professional demeanor, good analytical skills, strong attention to detail, and high ethical standards, among others</td>
</tr>
<tr>
<td>Lead Auditor</td>
<td>Meets all criteria of an Audit Team Member (above)</td>
</tr>
<tr>
<td></td>
<td>Contractor has participated as an audit team member in at least 3 audits of the specific metal audit to be conducted, under the supervision of a Lead Auditor</td>
</tr>
<tr>
<td></td>
<td>Contractor is approved by RMI prior to conducting the audit</td>
</tr>
</tbody>
</table>

Required Auditor Training and Certifications

The auditor approval process is supported by specific training courses on RMAP’s audit protocols and procedures, in addition to the pre-requisites for relevant audit training and experience. Auditor training courses can be found on the RMI eLearning Academy (free and open to all). Click here to request credentials for the eLearning Academy.

RMI Required Auditor Courses List – pre-requisite RMAP courses must be completed by all auditors prior to their first audit - available on the website: www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/rmap-audit-firm-and-auditor-approval/.

Related Documents

Auditors and Firms seeking accreditation should be familiar with the most recent RMAP Protocols and Procedures available on the RMI website at http://www.responsiblemineralsinitiative.org/audit-protocols-procedures/.

Audit Firm Auditor Training and Certifications

In addition to the required RMAP training, auditors must demonstrate during the application process that they have completed internal audit firm training process for (team/lead auditor), and other relevant external training and certifications, by providing supporting documentation such as current CVs, audit logs, shadow audit logs, auditor training and certification/accreditation certificates.
Auditors have to show:

- Existing management system training and accreditations, such as: ISO 19011, ISO 9001, ISO 14001, SA 8000, OHSAS 18001, or equivalent
- Current member of Association of Professional Social Compliance Auditors (APSCA), or can demonstrate conformance with APSCA membership requirements (www.theapsca.org)
- Current member of International Register of Certificated Auditors (IRCA), or can demonstrate conformance with IRCA membership requirements (www.quality.org)

Maintaining Competence and Requalification

Audit Firms
Audit firm Qualification shall last a maximum of three (3) years

- At the end of the three-year term, RMAP may invite the approved audit firm to re-apply
- Audit firm requalification process will follow the initial application process
- To apply, complete the Audit Firm Approval Application form, and check re-application box

The Qualification shall be invalid if there are significant changes to the operations of the Qualified Audit Firm not limited to:

- Change in ownership
- Change in management
- Significant change in policies related to RMAP work or requirements for which the audit firm was given Qualification

Individual Auditor
Auditor Qualification shall last as long as the auditor works for an approved auditing firm, so long as the following conditions are met:

- Annual training requirement does not lapse.
- Auditors are required to take annual training via the RMAP eLearning Academy or available in-person trainings.
- If Auditors do not complete annual training, they will need to complete before being re-instated as a Qualified Auditor
- Auditors must be re-qualified if they move to another auditing firm.

Use of Individual Contracted Auditors
While approved Audit Firms cannot sub-contract an assignment out to a non-approved Audit Firm, RMAP allows for the use of individual contracted Auditors, provided that the approved firm signs a contract agreement and an NDA directly with the auditor, and demonstrates to RMI that the approved firm retains full control over the whole audit process, enforcing quality, organizing audits, providing training, report review and overall QA. Approved firm also maintains a direct relationship with the auditor, and acts as a liaison between the auditor, RMI staff and auditees. Please refer to the contractor qualifications in section 9.4. Any auditor who is not a direct employee of the audit firm shall be subject to all contractor requirements in this manual.
RMAP will not allow the use of non-qualified Auditors. A non-Qualified Auditor shall be considered to be a trainee and will be subject to the guidance on observers. This section does not preclude the audit firm from contracting professional translation resources as needed.

**Audit Firm Qualification Validity**

**Suspension**

The RMAP may suspend approved audit firms and/or specific Auditors for the following reasons:

- Lack of language ability in a particular country or region
- Insufficient capacity (number of Qualified Auditors and/or number of Qualified Lead Auditors) in a particular country or region

The RMAP may reinstate a suspended auditing firms and/or Auditors if the reason(s) for suspension are sufficiently addressed and can be demonstrated using supporting evidence.

**Suspension with Corrective Action Plan**

The RMAP may suspend approved audit firms and/or specific Auditors and provide an opportunity for a Corrective Action Plan for the following reasons:

- Poor performance in a particular country or region
- Poor performance globally
- Breach of any RMAP policy and procedure, including the Conflict of Interest Policy, Non-Disclosure Agreements, etc.

The RMAP will decide the length of time for the auditing firm or auditor’s suspension. This decision shall be based on the issue for the suspension along with a reasonable estimate for the amount of time it would take to satisfactorily implement corrective actions.

To be reinstated, suspended auditing firms must conduct three re-entry audits that shall not be initial audits. Upon satisfactory completion of the three re-entry audits, the RMAP may re-instate the auditing firm or auditor. If the re-entry audits are not satisfactorily completed, the auditor/auditing firm shall conduct three more re-entry audits. If those are not satisfactorily completed, the auditor/auditing firm shall be permanently disqualified.

**Disqualification**

The RMAP may disqualify audit firms and/or specific Auditors for the following reasons:

- Unable to meet audit firm knowledge and skills
- Breach of any RMAP policy and procedure, including the Conflict of Interest Policy, Non-Disclosure Agreements, etc.
- Ethics violations including accepting bribes, etc.

The disqualification may be local/country or region-specific or global.