RESPONSIBLE MINERALS
ASSURANCE PROCESS

PUBLIC DUE DILIGENCE REPORT
WRITING GUIDANCE
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1. Introduction

As companies continue to conduct due diligence as an ongoing activity, it is important to report on the progress and impacts of those efforts, as well as the process to achieve those goals. One of the requirements of the RMAP revised standards, tasks smelters and refiners with developing a public report that details the company’s due diligence management system and the activities carried out as a part of that system in accordance with the expectations of Step 5 of the OECD Guidance.

There is an increasing expectation from stakeholders that companies report on their due diligence activities. These stakeholders include shareholders, raters (financial, extra-financial), customers, academia, civil society organizations, and the general public. The intent of a report may be to inform regulators or civil society organizations, provide information to investors or customers, or strengthen a company’s reputation. In any case, the call for transparency about both the process (how is due diligence conducted) and the impact (how did the due diligence effect change) is clear. Stakeholders request this information in order to make informed choices about their investments, supplier-base, aggregate the data to make larger claims about impact, inform others about the risks in the supply chain, or to demonstrate continual improvement and progress over time, as a few examples.

Some stakeholders have varying needs or opinions on what should be included. For many companies, setting targets that they can report on is difficult. One suggestion is to set step-wise targets that can be easily tracked and discussed. Additionally, reporting on setbacks or targets that were not reached is also valuable because it demonstrates that a company is being transparent.

The Public Due Diligence Report is commonly referred to as the Step 5 report, referencing Step 5 of the OECD Due Diligence Guidance. According to the OECD Guidance, Step 5 requires companies to meaningfully report on supply chain due diligence “in order to generate public confidence in the measures companies are taking.” This guidance will help unpack this statement, in order to help companies prepare their report.
2. About this Template

This report template has been developed by the Responsible Minerals Initiative (RMI) to provide guidance on public disclosure on supply chain due diligence by smelters and refiners as required by the Responsible Minerals Assurance Process (RMAP). The OECD Due Diligence Guidance for Responsible Supply Chains from Conflicted-Affected and High-Risk Areas (OECD Guidance) is the key reference standard with which the current RMAP standards are aligned. It requires upstream companies to publish annual reports on supply chain due diligence policies and practices with due regard to business confidentiality and other competitive concerns. Smelters and refiners are considered an upstream entity for the purposes of the OECD Guidance, and they must conform to the OECD Step 5 reporting requirements for upstream companies to conform with the RMAP standards.

This report template contains recommended core elements of reporting on due diligence, sample text and examples in view of guiding smelter and refiner practices towards disclosure that is aligned with good practices and international reporting standards. The examples and sample text provided are for illustrative purposes only and need to be amended to represent each company’s own practices. Smelters and refiners with simple, low-risk, mineral supply chains are able to simplify the reporting to reflect the reduced complexity of their due diligence system. Sections that are material to all smelters and refiners are indicated as “ALL SOURCES” whereas sections that are only applicable for reporting by smelters and refiners with high-risk supply chains are indicated as “ONLY HIGH-RISK SOURCING”.

The RMI and the Global Reporting Initiative (GRI) are working on a project in 2018 to identify gaps and provide the reporting community with reporting resources and tools specifically for the disclosure required under Step 5 of the OECD Guidance. Results of this project are expected by early 2019. This project may further influence the guidance provided in this template.
3. About RMAP

The Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Smelter Program (CFSP), takes a unique approach to helping companies make informed choices about responsibly sourced 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 assessment of smelter/refiner management systems and sourcing practices to validate conformance with RMAP standards. The assessment employs a risk-based approach to validate smelters’ company level management processes for responsible mineral sourcing. Downstream companies can then use this information to inform their sourcing choices. A list of smelters and refiners that meet the requirements of the assessment standards are published on the RMI website. The assessment standards are developed according to global standards including the OECD Guidance and the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. Consequently, the assessment standards require participating smelters and refiners to publish due diligence information in accordance with Step 5 of the OECD Guidance. This template is intended to help smelters and refiners conform with this requirement.
4. Due Diligence Report Template

4.1 Company Information (ALL SOURCES) – note this should be duplicated for each facility

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Company name</td>
</tr>
<tr>
<td>b. CID number</td>
</tr>
<tr>
<td>c. Company location</td>
</tr>
<tr>
<td>d. 3TG material processed</td>
</tr>
<tr>
<td>e. Time period covered by this report (*Note on time period: the report should cover all time periods and there should be no breach in time between this report and the previous one.)</td>
</tr>
</tbody>
</table>

4.2 RMAP Assessment Summary (ALL SOURCES) – note this should be duplicated for each facility

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Date of last RMAP assessment per facility</td>
</tr>
<tr>
<td>b. Assessment period</td>
</tr>
<tr>
<td>c. Assessment firm</td>
</tr>
<tr>
<td>d. URL to most recent assessment summary report</td>
</tr>
</tbody>
</table>

4.3 Company Supply Chain Policy (ALL SOURCES)

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Note that the company has a policy and this has been part of the RMAP assessment (conform / non-conform).</td>
<td>OECD Due Diligence Guidance - Step 1: companies adopt and clearly communicate to stakeholders a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas. This policy should be consistent with the standards set forth in the model supply chain policy in Annex II.</td>
</tr>
<tr>
<td>b. Include a link to the company’s supply chain statement.</td>
<td>The policy must be publicly available as per the RMAP Standard requirements.</td>
</tr>
</tbody>
</table>
### 4.4 Company Management System (ALL SOURCES)

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Management Structure</td>
<td>OECD Due Diligence Guidance - Step 1: Companies establish strong company management systems to support supply chain due diligence.</td>
</tr>
<tr>
<td>ii. Describe the senior management structure assigned to oversee due diligence including roles and responsibilities.</td>
<td></td>
</tr>
<tr>
<td>iii. Describe the relevant functional departments (e.g. purchasing department, quality control department, sustainability etc.) that may be affected by the findings of actual and/or potential risks identified in the supply chain and their roles in due diligence implementation. Explain whether responsibility is linked to performance assessments or other incentive mechanisms.</td>
<td></td>
</tr>
<tr>
<td>iv. Provide the evidence for training of relevant personnel with roles and responsibilities defined in the due diligence program.</td>
<td></td>
</tr>
<tr>
<td>v. Describe how actions and reporting have been maintained or improved from the previous year’s activities.</td>
<td></td>
</tr>
</tbody>
</table>

#### a. Internal Systems of Control

Describe the company’s internal control systems over the mineral supply chain, and explain how they operate and what data they have provided as part of due diligence efforts in the reporting period.

i. Describe at a high level the company’s processes/procedures to control the origin of material (e.g. policy to only source from low-risk countries if applicable; enforcing supplier expectations and requirements through contracts or other written agreements; reviewing material upon receipt; conducting a mass balance assessment throughout the process).
ii. Describe any engagement with suppliers to improve their due diligence performance, e.g. training, calls, meetings or other forms of engagement. Describe any supplier improvement programs the company may deploy. This may include quantitative information such as the number or percentage of suppliers engaged.

iii. Reference the grievance mechanism(s) used by the company (e.g. company grievance mechanism; industry grievance mechanism; etc.) and explain how the information gathered from the mechanism(s) is integrated into the company’s due diligence process. Also describe the process for handling complaints through the mechanism if it is a company grievance mechanism.

<table>
<thead>
<tr>
<th>b. Record Keeping System</th>
<th>OECD Due Diligence Guidance (Supplement on Tin, Tantalum and Tungsten; Supplement on Gold): Maintain related records for a minimum of five years, preferably on a computerized database.</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Confirm that appropriate documentation is maintained per a record keeping system.</td>
<td></td>
</tr>
<tr>
<td>ii. Describe records retention time per document type (at least 5 years).</td>
<td></td>
</tr>
<tr>
<td>iii. Describe the process to ensure documents/records are properly used and are safely stored.</td>
<td></td>
</tr>
</tbody>
</table>

### 4.5 Risk Identification (ALL SOURCES)

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Methodology</td>
<td>OECD Due Diligence Guidance – Step 2: Companies should:</td>
</tr>
<tr>
<td>i. Summarize the procedure to define conflict-affected and high-risk areas (CAHRAs), including the resources used, criteria applied and the frequency for review.</td>
<td>A) Identify risks in their supply chain as recommended in the Supplements.</td>
</tr>
<tr>
<td></td>
<td>B) Assess risks of adverse impacts in light of the standards of their supply chain policy consistent</td>
</tr>
<tr>
<td>ii.</td>
<td>Summarize the Know Your Supplier (KYS) process</td>
</tr>
<tr>
<td>-----</td>
<td>------------------------------------------------</td>
</tr>
<tr>
<td>iii.</td>
<td>Summarize the scope of the risk assessment, in particular describe which risks you consider material to the supply chain and why they are considered material. These must include reference to the OECD Annex II risks.</td>
</tr>
<tr>
<td>iv.</td>
<td>Note if any risks were actually identified (note: it is not necessary to disclose the specific risks, incidents or supply chain actors but rather what general information such as the risk area they related to. E.g. human rights abuses; support for non-state armed group or security forces; bribery and fraudulent misrepresentation of origin etc. General information could also refer to the country / geography risks were identified or incidents occurred in.</td>
</tr>
<tr>
<td>v.</td>
<td>ONLY HIGH-RISK SOURCING: Describe the methodology, practices, and information yielded in an on-the-ground assessments. Note: it is not necessary to disclose which sites were visited, but rather what is the methodology used to conduct the on-the-ground assessments with Annex II and the due diligence recommendations in this Guidance.</td>
</tr>
</tbody>
</table>

**Methodology to define CAHRAs:** RMI recommends that companies: 1) use their supply chain / responsible sourcing / human rights policy as a basis for identifying material risks (for example, armed conflict, weak governance and egregious human rights abuses as related to the mining sector), 2) search for relevant third-party resources to assess the presence of those risks (for example, the Heidelberg Conflict Barometer) and 3) establish a benchmark / indicators for different risk levels. **Note: these are non-binding recommendations only.**

**KYS Process:**

- **OECD Due Diligence Guidance & Gold Supplement:** companies identify KYS information of all third party service providers through the following measures: identifying ownership and corporate structure; identifying related businesses; verification using reliable, independent source documents; checking government watch list information (e.g. UN sanction lists); identification of any affiliation of the company with the government, political parties, military, criminal networks or non-state armed groups.

- **RMAP:** companies identify the type of business relationship and legality of business operations – business license, business structure and registration, individual identification pieces etc.

- **OECD Due Diligence Guidance (Supplement on Tin, Tantalum and Tungsten) – Step 2:** Upstream companies should assess the context of conflict-affected and high-risk
ground assessments. E.g. how the
assessment was planned, the criteria to
select an assessment team; what the
assessment activities were, the outputs /
reports and how the results were analyzed etc.

areas; clarify the chain of custody, the
activities and relationships of all upstream
suppliers; and identify the locations and
qualitative conditions of the extraction,
trade, handling and export of the mineral.
Upstream companies should rely on
information collected and maintained
through Step 1, and should gain and
maintain up-to-date on-the-ground
information in order to map the supply
chain and assess risk effectively.

### 4.6 Risk Mitigation (ONLY HIGH-RISK SOURCING)

<table>
<thead>
<tr>
<th>Recommended Core Elements</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>a. Methodology</strong></td>
<td><strong>OECD Due Diligence Guidance – Step 3:</strong> Companies design and implement a strategy to respond to identified risks including reporting on the findings to senior management; developing and adopting a risk management plan; monitoring and tracking performance; and undertaking additional risk assessments as necessary.</td>
</tr>
<tr>
<td>i. Describe the company’s process for risk management and how it relates to the Supply Chain Policy.</td>
<td></td>
</tr>
<tr>
<td>ii. Describe the risk mitigation strategy - including which parts of the supply chain are in scope. Companies should consider the following types of entities for the definition of scope and engagement for risk mitigation activities: suppliers, including suppliers beyond first tier, trading entities, local NGOs, government agencies and industry bodies.</td>
<td></td>
</tr>
<tr>
<td>iii. Describe the process to respond to assessed risks (including how severity of risks is determined)</td>
<td></td>
</tr>
<tr>
<td>iv. Describe the involvement of suppliers and affected stakeholders (e.g. government, local communities, NGOs, customers) in risk mitigation. Note it is not necessary to disclose names or identities of supply chain actors but the report could include the types of stakeholders engaged or consulted.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>v.</td>
<td>Describe the actions that have been taken to mitigate the risks (including timeliness of responses). It is not necessary to disclose details on the risk(s), incidents or supply chain actors but rather a description of the type of engagement and activities undertaken.</td>
</tr>
<tr>
<td>vi.</td>
<td>Describe how the effectiveness of risk mitigation efforts is monitored and evaluated.</td>
</tr>
<tr>
<td>vii.</td>
<td>Describe the process to respond if risk mitigation efforts failed.</td>
</tr>
</tbody>
</table>
1. Company Information (ALL SOURCES)

The company is called SAMPLE Company Limited.

The company was established in 1934 with subsidiaries SAMPLE 2, SAMPLE 3, and SAMPLE 4 established in 1950, 1955, and 1960 respectively. The company’s CID number is CID005368. The company has 1 smelting facility called SAMPLE Facility A, located at Sample Street 131, Smelter Town, Mineralsland. The smelting/refining facilities are processing tantalum products.

2. RMAP Assessment Summary (ALL SOURCES)

Sample Facility A has undergone a RMAP assessment on 5th March 2018. The assessment is valid for one year. The assessment period was from 6th March 2017 to 4th March 2018. The assessment was conducted by Responsible Sourcing Audit Firm.

The assessment summary report is public and available at: www.samplecompany.com

3. Company Supply Chain Policy (ALL SOURCES)

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, the company has developed a supply chain policy. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on the company website at www.samplecompany.com.


Management Structure

The company follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- The company’s COO is responsible to oversee the due diligence program and risk management design and implementation.
- The company has assigned a due diligence program manager to coordinate the work of the relevant departments (including the Purchasing Department, Quality Department, Production Department,
and Warehouse Management Department) to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified.

- The company conducts due diligence management system training once a year for key staff from all relevant departments required in due diligence program. If there is an update of the program, the company conducts additional training as necessary.

**Internal Systems of Control**

The company has established/updated its due diligence management system to be aligned with the OECD Guidance and RMAP in January 2018. The company communicated the updated supply chain policy and sourcing requirements to all identified upstream suppliers in February 2018. The company has incorporated due diligence requirements into legally binding agreements with direct suppliers. The company visits 10 percent of its direct suppliers twice every year, representing 80 percent of annual volume, and includes due diligence requirements as part of the conversation.

The company refers to RMI’s grievance mechanism to collect information on grievances from interested parties.

**Record Keeping System**

The company requires that all records relating to the due diligence program are maintained at least for five years and that they be properly used and safely stored in our online company database.

**5. Risk Identification (ALL SOURCES)**

The company has a robust process to identify risks in the supply chain.

Firstly, referring to the risks in the company’s supply chain policy, the company established a procedure to identify CAHRAs. The procedure includes the resources used, the criteria to define a “conflict-affected and high-risk” area as well as the frequency with which our determination is reviewed. The company uses the following resources to determine CAHRAs:

- The Heidelberg Conflict Barometer provides conflict maps, representing an annual snapshot of the presence of armed conflict.
- The INFORM Index for Risk Management provides country-level risk profiles relating to humanitarian crises.

Referring to its supply chain policy and external resources, the company has defined criteria and benchmark indicators to determine CAHRAs.

Secondly, the company designed a Know Your Supplier (KYS) to include information concerning supplier legal status and identity, supplier mapping and potential risks. The majority of our suppliers, representing 80 percent of our annual volume, have completed and returned a KYS form. The company’s due diligence program manager reviewed the provided information and the UN Sanction List with the Purchasing Team. Whenever inconsistencies, errors or incomplete information were identified in the KYS
form, the company communicated the improvement areas to suppliers and requested an updated form. If red flags were identified, the company would further engage with its suppliers to clarify and improve the documents as needed. During this reporting period, no red flags were identified related to submitted KYS forms.

Thirdly, the company requested origin information for each material transaction and ensured that it was able to understand the transaction origin, transportation route, as well as direct suppliers’ names and locations.

Fourthly, all information collected was reviewed by the company against CAHRAs, sanction lists, local laws and internal sourcing requirements.

**Risk Assessment (HIGH RISK SOURCING ONLY)**

For material and supply chains determined to be “high-risk”, the company conducted enhanced due diligence. This included:

- Assessing the context of CAHRAs;
- Clarifying the chain of custody;
- Assessing the activities and relationships of upstream suppliers;
- Identifying locations and qualitative conditions of the extraction, trade, handling, and export of minerals; and,
- Conducting on-the-ground assessments.

In order to map the factual circumstances, conduct on-the-ground assessments and assess risks in the high risk supply chains, we relied on the following:

**Scenario 1: Participation in RMI recognized upstream assurance mechanisms:**

**Better Sourcing Program (BSP):**

The company has been using the Better Sourcing Program (BSP) during this reporting period to assess risks for each high-risk sourcing transaction. The program maps the company’s upstream supply chain and provides the information/documents listed below. The information relates to each shipment of material, and is accessed directly on the BSP software platform:

1) Mining company supplier due diligence program (e.g. KYS questionnaire, company registration, mining license, certificate of payment of taxes)

2) Governance information relating to operating/ country context of mining company supplier (e.g. political, economic and security situation, due diligence standards)

3) Mining company supplier baseline assessment report (BSP field agents conduct an initial baseline assessment of the OECD Guidance Annex II risks at each mine site)

4) Mining company supplier dynamic evaluation report (for each mine site, BSP field agents continuously monitor risks and incidents on the ground using a mobile application)

OR
iTSCi:
The company has been an active member of iTSCi during this reporting period. For each high-risk sourcing transaction, iTSCi provides the following documents:

1) Incident summary reports as they become available
2) Mine Visit Recommendations including a list of mine sites with potential risks (it is advised that companies sourcing from these mine sites conduct enhanced due diligence and risk assessment)
3) Monthly country and region reports, which review the general situation on the ground
4) Data summary and other reports

The company has conducted further due diligence to review these documents from upstream program against information in the public domain and the actual transaction information to assess the level of risk.

Scenario 2: Assessing risks without an upstream program:
The company conducted basic research on the CAHRAs identified in our supply chain. This included publicly available reports regarding the governance, security and human rights context of the countries as well as reports specifically mentioning human rights abuses related to tantalum mining practices.

Secondly, the company completed a stakeholder mapping to inform our stakeholder engagement strategy. To complement the mapping, the company required our direct suppliers to provide the names, locations and types of business operations for each supply chain actor between the mine sites and the in-country exporter. The company conducted an enhanced KYS process for all upstream actors from the trader to the mine. Working with our supply chain partners, we collected chain of custody documentation for each material transaction and ensured that it was able to understand the transaction origin and transportation route.

In April 2017 the company, with third party support, conducted an on-the-ground mine site assessment. Through a mine tour, a document check and interviews with mine workers, consultation with local communities and other stakeholders, the company assessed all the risks under Annex II of OECD Guidance and generated a mine site visit report.

In addition, the company supported the establishment of a community monitoring committee. Working with a local partner organization, training was provided to the monitoring committee members with a view to enable the reporting of any risks or incidents in the supply chain. In June 2017, the community monitoring committee reported instances of child labor at one of the mine sites in the company’s supply chain.

The company had been sourcing from a mine in that country through a trader. The company reviewed the information collected through desktop research and stakeholder interviews and identified that a concentrator was the key influence actor. With the assistance of the trader and concentrator, the senior manager from the company re-visited the mine to review the conditions. There was no child labor found at the mine site during the visit, however, there was a history of confirmed child labor and the mine site lacked the resources and a procedure to ensure that there is no child labor at the mine site in the future. This was a high-risk base according to the risk assessment criteria from the company.
6. Risk Mitigation (HIGH RISK SOURCING ONLY)

The company’s Supply Chain Policy defines three possible risk mitigation strategies in accordance with the OECD Guidance Annex II Model Policy. Risks identified in high-risk supply chains are mitigated as follows:

**Scenario 1: Participation in RMI recognized upstream assurance mechanisms:**

**Better Sourcing Program (BSP):**

Based on the findings of the initial baseline report and the dynamic evaluation report, BSP provides technical advice and helps the participating mining companies close any gaps in due diligence management systems (e.g. develop a supply chain policy, establish a management structure), achieve traceability (e.g. develop an electronic tagging system) and respond to identified risks. Each identified risk is reviewed and scored on the basis of its severity (minor, moderate and major) while BSP provides a standardized protocol for how the risk can be mitigated in the short term and long term by the mining company. The effectiveness of mitigation is tracked and reported on periodically by BSP field agents who are also involved in related engagement with affected stakeholders (e.g. local communities). The company assesses this data in consultation with BSP and supply chain participants as needed to infer whether additional risk mitigation action is required.

**iTSCi:**

The company checks with the ITSCi secretariat to obtain details of the risk mitigation process. The company seeks to:

- Identify the specific source of the material including the name of the producer and exporter
- Identify whether the reported risks have been addressed and/or are re-reported in the subsequent reporting period.
- Query the methodology for addressing the risks including who performed risk mitigation activities
- Request regular updates of the risk mitigation activities for relevant supply chains

**Scenario 2: Mitigating risks without an upstream program:**

The company reports the one mine as a high-risk sourcing supplier to the senior manager and decides to continue business with the supplier while implementing a risk mitigation plan. The company consults its suppliers, customers and local stakeholders on the risk mitigation strategy to ensure its feasibility and effective. With all parties’ agreement, the company develops a risk mitigation plan. The trader and the concentrator are required to support the implementation of the risk mitigation plan at the mine site. As part of a 3-month improvement plan, the mine site has taken remediation actions and set up a due diligence procedure to ensure no child labor is present. The company hired a third-party assessment firm, which is an expert in OECD five steps framework, to visit the mine site in the following 6 months and confirmed that the risk mitigation is effective. The company ensures that it assesses risks on an ongoing basis by working in partnership with suppliers and other stakeholders (e.g. local community, NGO, customers, industry organization, consulting company) engaged in continuous risk monitoring at the mine site.
7. Reporting on Risks beyond Annex II (OPTIONAL)

*We manage risks outside those identified by Annex II and use the RRA to report to our customers on how we manage those issues.*