Overview

The Responsible Minerals Initiative (RMI) Recognition Process defines the process and criteria utilized by the RMI to review standards, assessment programs, and/or upstream assurance mechanisms (including but not limited to institutionalized mechanisms and joint initiatives as defined by the OECD Guidance) to determine partial or full recognition for purposes of meeting RMI’s tool and program requirements.
1. Scope

The RMI Recognition Process covers the following:

<table>
<thead>
<tr>
<th>Supply Chain Scope</th>
<th>Program Type</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Responsible Minerals Assurance Process (RMAP) - Upstream</td>
<td>Upstream Assurance Mechanisms</td>
<td>May be recognized to meet some or all of the upstream due diligence requirements under RMAP and covering any of the materials.</td>
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<tr>
<td>2. RMAP - Midstream Industry Assessment Programs</td>
<td>Industry Assessment Programs</td>
<td>May be recognized to meet some or all of the RMAP requirements for smelters/refiners.</td>
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<tr>
<td>3. Risk Readiness Assessment (RRA) – Upstream and Midstream</td>
<td>Voluntary Standard Systems (VSS)</td>
<td>May be recognized to partially meet, meet, or exceed the industry norm for some or all issue areas of the Risk Readiness Assessment (RRA) and covering any of the materials included in the RRA.</td>
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For the purpose of this process, the following definitions apply:

**Artisanal and small-scale mining**: Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing, and transportation. ASM is normally low capital intensive and uses high labor-intensive technology. “ASM” can include men and women working on an individual basis as well as those working in family groups, in partnership, or as members of cooperatives or other types of legal associations and enterprises involving hundreds or even thousands of miners.

**Downstream**: The minerals supply chain from smelters/refiners to retailers.

**Facility**: A singular location of a company.

**Institutionalized mechanism**: A body established at the industry’s initiative level, supported by governments, and in cooperation with relevant stakeholders with the mandate to collect and process information on minerals from conflict-affected and high-risk areas. The institutionalized mechanism may implement or oversee audits.

**Joint initiative**: An industry-wide initiative enabling cooperation between companies, on responsible supply chain management meeting the due diligence principles, standards and processes of the OECD Guidance which may assist in establishing a system of controls over the supply chain to build leverage, overcome practical challenges and effectively discharge the due diligence recommendations contained in the OECD Guidance. The joint initiative may establish suitably qualified and independent on-the-ground assessment teams, including to report on risks, recommend risk management, engage stakeholders and measure progress as well as having information systems jointly accessible by companies.
**Midstream:** Includes smelter/refiners which are companies with one or more facilities treating ore concentrates in order to produce metal and/or companies with one or more processes with the ability to treat secondary materials for the production of metals or products.

**Upstream:** The mineral supply chain from the mine up to but not including the smelter/refiner, includes artisanal or small-scale producing enterprises, rather than individuals or informal working groups of artisanal miners.

**Upstream Assurance Mechanism:** A system that provides upstream actors with the necessary due diligence and/or chain of custody requirements to help conform to the OECD Due Diligence guidance. These mechanisms may be third party entities or industry wide initiatives. In all cases, upstream entities retain individual responsibility for their due diligence.

2. Eligibility Criteria

Programs must meet the following implementation criteria to be eligible for a review:

*Table 2: RMI Recognition Process - Implementation Criteria*

<table>
<thead>
<tr>
<th>AREA</th>
<th>CRITERIA</th>
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<tbody>
<tr>
<td>IMPLEMENTATION</td>
<td>Implementation of the standard is required for companies participating in program.</td>
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<td></td>
<td>The standard shall be implemented at site-level. This includes the implementation of corporate policies / procedures at site-level.</td>
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<tr>
<td>ASSURANCE</td>
<td>Independent third-party assessments are required, at a minimum every three (3) years, to demonstrate implementation of the standard by companies participating in the program. Where assurance is managed by the program, appropriate controls must be in place to ensure the assurance process is impartial and free of any conflict of interest.</td>
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<td></td>
<td>Independent third-party assessments shall assess evidence of implementation at the site-level.</td>
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<td></td>
<td>To ensure auditors conducting the independent third-party assessment are impartial, free of any conflict of interest and collectively have the skills and competencies required to conduct the assessment, the program shall:</td>
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<td></td>
<td>- Clearly define the qualifications and competence criteria.</td>
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<td>- Require that auditor competence is demonstrated on a recurring basis.</td>
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1 The following resources have been considered to define the criteria: ISEAL Credibility Principles, Consumer Goods Forum, Sustainable Supply Chains Initiative (SSCI), Management Criteria (draft for consultation), WWF Certification Assessment Tool.
Individual program types as defined in Table 1 above may also have additional criteria used to determine eligibility for RMI recognition. These criteria are described below.

2.a. Upstream Assurance Mechanisms

RMI may recognize the Upstream Assurance Mechanisms at two levels. The following criteria are required for an Upstream Assurance Mechanisms to be recognized for each level:

2.a.1. Level 1: Full Recognition – Standard and Implementation

Alignment with the OECD Due Diligence Guidance, demonstrated through an OECD Alignment Assessment conducted by an independent third-party using the OECD’s Alignment Assessment Methodology and Alignment Assessment Tool for:

- Standard
- Implementation
  - Demonstration of implementation is required for participating programs
- Governance
  - Governance can be demonstrated as part of the Alignment Assessment, or separately, if not included in the assessment scope (i.e. assessment for the purposes of the EU recognition), utilizing OECD Alignment Assessment Tool “Governance tab” and following Alignment Assessment Methodology requirements.

Note: Programs approved by the European Commission in Accordance with the EU Delegated Act Supplementing Regulation (EU) 2017/821, can utilize outcomes of that assessment for the RMI recognition purposes, but would still need to submit completed “Governance tab” of the Alignment Assessment Tool and supporting evidence, demonstrating alignment.

Additionally, for fully recognized Upstream Assurance Mechanisms, the RMI expects:
- For the program to provide a publicly accessible grievance mechanism, as an early-warning risk-awareness and resolution system.

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2 Alignment shall mean that the program standards and implementation are greater than 70% alignment with the criteria in the OECD Due Diligence Guidance Alignment Assessment Tool. For any applicants that have greater than 70% alignment but not reached full alignment (defined as 100%), a corrective action plan is expected to be put in place prior to formal recognition by RMI. The corrective action plan must be successfully completed within one year of formal recognition by RMI to reach at least 90% alignment. For any programs where alignment is less than 70%, RMI will not provide recognition. In this case, the RMI recommends the program implement a corrective action plan to achieve at least 70% alignment before re-applying. RMI reserves the right to require corrective actions for any applicant on any aspect of alignment.
Where programs have implemented an incident collection, reporting and resolution process, that it is conducted in-line with the principles for supply chain due diligence and continuous improvement outlined in the OECD Due Diligence Guidance.

- That policies and procedures for incident collection, classification, communication and resolution are made publicly available.

Where the upstream assurance mechanism meets the above criteria, the mechanism’s implementation at a programmatic level does not need to be re-assessed as part of the RMAP smelter/refiner assessment. The facility’s application of the upstream assurance mechanism and use of data provided by the upstream assurance mechanism by the smelter/refiner will be assessed by the RMAP auditor as part of the RMAP smelter/refiner assessment.

2.a.2. Level 2: Partial Recognition – Standard ONLY

Alignment of the programs’ Standard with the OECD Due Diligence Guidance, demonstrated through an OECD Alignment Assessment conducted by an independent third-party using the OECD’s Alignment Assessment Methodology and Alignment Assessment Tool for:

- Standard

Verification of Implementation of the Standard at a programmatic level will be required on-site

- Implementation to be assessed as part of the RMAP smelter/refiner assessment

2.b. Industry Assessment Programs

RMI may recognize Industry Assessment Programs that are similar in scope, content, procedure, and purpose to the RMAP program. The following criteria are required for an Industry Assessment Program to be recognized:

- Alignment with the OECD Due Diligence Guidance, demonstrated through an OECD Alignment Assessment conducted by an independent third-party using the OECD’s Alignment Assessment Methodology and Alignment Assessment Tool, for:
  - Standard
  - Implementation
    - Demonstration of implementation is required for participating programs
  - Governance
    - Governance can be demonstrated as part of the Alignment Assessment, or separately, if not included in the assessment scope (i.e. assessment for the purposes of the EU recognition), utilizing OECD Alignment Assessment Tool “Governance tab” and following Alignment Assessment Methodology requirements.
- Note: Programs approved by the European Commission in Accordance with the EU Delegated Act Supplementing Regulation (EU) 2017/821, can utilize outcomes of that assessment for the RMI recognition purposes, but would still need to submit completed “Governance tab” of the Alignment Assessment Tool and supporting evidence, demonstrating alignment.

- Additional criteria for cross-recognition policy conformance:
  - Written commitment to adhere to the RMI’s Cross-Recognition Policy and to provide information required by this policy and by the RMI Cross-listing Procedure.

2.c. Voluntary Standard Systems (VSS)

The RRA Recognition Process provides a transparent process for RMI to recognize programs that meet some or all of the RRA industry norms and are credibly implemented by company sites. Its objectives are to:

1. Increase uptake of the RRA among upstream and downstream users by recognizing existing programs that are credibly implemented by company sites.
2. Provide RMI members, mineral producers and other stakeholders with the data necessary to inform responsible mineral production and sourcing practices.

*Figure 1: Summary of RRA Recognition Process*
The following criteria have to be met for a program to be recognized for some or all of the RRA industry norms.

The program’s standard must be included in the RRA Standards Comparison. To be included in the RRA Standards Comparison, the standard shall meet the criteria defined in the RRA Methodology. These are:

1. The standard is relevant to the mineral supply chain;
2. The standard has been formally launched for implementation. Where a standard is undergoing revisions, the current version of the standard is applied until a revised version has been formally launched for implementation;
3. The standard shall address at least some of the ESG issue areas included in the RRA;
4. The standard shall address performance management for the operations and businesses that use its system;
5. The standard shall be independently audited.
6. Individual company requirements (e.g. company code of conduct, company programs) are not included in the scope of standards used to determine the industry norm.

A standard that is not included in the RRA Standards Comparison, but meets the criteria defined in the RRA Methodology, may submit a request to the RMI to be added. New standards may be added to the Standards Comparison on a rolling basis; however, they will only be taken into account for the industry norm during the regular RRA review process.

For a program to be recognized to meet some or all of the RRA industry norms, it shall:

1. Have all standard provisions related to the RRA issue areas benchmarked against the RRA industry norm.
2. Be able to demonstrate that the standard is credibly implemented, in accordance with the criteria in Table 2 above.

2.c.1. Benchmarking of Standards

The program shall provide the results of the benchmarking of its standard against all RRA issue areas. For each issue area, the program shall indicate whether its standard does not meet, partially meets, meets or exceeds the industry norm:

| "Does not meet" | The program may address the issue area but none of the requirements of the industry norm are codified in the program. |

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3 The RRA Methodology is currently under review. The reference to the methodology will be included as soon as the review process is finalized.
"Partially meet"  The program includes some, but not all requirements of the industry norm.

"Meet"  The program includes all requirements of the industry norm.

"Exceeds"  The program includes all requirements of the industry norm as well as additional requirements for the issue area.

"Not included"  The program does not address the issue area.

The benchmarking shall include the standard text as well as any supporting text that is designed to clarify or interpret the standard text (e.g., codes, provisions, protocols, guidance, and workbooks).

The benchmarking shall be commissioned by the program and completed by a qualified, independent, third-party approved by RMI. The RMI may approve a single third-party, free of any conflict of interest, to ensure the consistency of the benchmarking. The RMI will review and approve the final benchmarking for each program.

2.c.2. Criteria for Implementation

The program shall provide evidence to demonstrate that is meets all implementation criteria defined in Table 2 above. Full ISEAL members are considered to meet the criteria defined in Table 2 above.

The program has to notify RMI if there are any substantive changes to the standard to re-assess the equivalency.

3. Application and Review Process

3.1 Application Requirements

Organizations may submit an application to the RMI, including the following supporting evidence:

<table>
<thead>
<tr>
<th>Type of organization</th>
<th>Evidence Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upstream Assurance Mechanisms</td>
<td>- Application Form</td>
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<tr>
<td></td>
<td>- Standard and/or Process requirements applied to the upstream</td>
</tr>
<tr>
<td></td>
<td>- Report of the independent third-party OECD Alignment</td>
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<td></td>
<td>Assessment, including implementation assessment results, if</td>
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<tr>
<td></td>
<td>applicable</td>
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</table>
### 3.2 Review Process

RMI will review the application within 45 calendar days, including the review of the supporting evidence and conduct a due diligence review of the applying program.

If needed, RMI will request further information or clarifications from the applying program. Upon receipt of the requested information and completion of the review process, the RMI will prepare a written recommendation to approve / not approve the program for review by the RMI Steering Committee. The recommendation will be reviewed and a formal decision will be taken by the RMI Steering Committee.

The RMI may conduct shadow assessments of applicant program audits and/or site-visits of the applicant on-the-ground-operations as part of the initial application and on-going review, as applicable.

The RMI will communicate the decision, to the applying program within 10 business days of the decision. Recognized programs will be listed on the RMI webpage, including information on the scope of the recognition. Applying programs will have the opportunity to re-apply once any identified gaps against the RMI’s requirements have been addressed.

### 3.3 Frequency of Review

The recognition status of each program will be reviewed every three (3) years or sooner if there are major changes to the program that impact the areas covered by this process. Recognized programs commit to notifying RMI of any major changes to their programs that may potentially affect recognition.
The RMI reserves the right to request additional information or require a review of the recognition status prior to the three-year cycle.

4. On-going Due Diligence & Grievance Management

The RMI may conduct on-going monitoring and due diligence review of the recognized programs in relation to the areas covered by this recognition process on as needed basis.

The RMI reserves the right to request additional information on the standard, program operations, grievances, risks or incidents relevant to the program, and to provide feedback to encourage continuous progressive improvement, where relevant.

4.1 Escalation Process

Where a grievance has been raised in regard to an area covered by RMI’s Recognition Process, the RMI will follow the process below:

1. The RMI will engage bilaterally with the program, including, for example, through the program’s own grievance mechanism and / or the RMI’s Grievance Mechanism.
   a. The RMI reserves the right to request additional information on grievances raised in relation to the areas covered by this recognition process
   b. RMI may work with the recognized program to identify and implement corrective actions, as needed
2. If the bilateral engagement is not successful and / or required corrective actions are not completed, RMI may suspend the recognition for three months to allow for the program to address outstanding issues.
3. If the outstanding issues are not addressed within three months, the RMI may terminate the recognition.
4. The program may re-apply after 1 year, by completing the full application process and demonstrating that all corrective actions have been addressed.

5. Appeals Process

A program is able to appeal RMI’s recognition decision within 45 calendar days of the communication of that decision. An appeal will be referred to the RMI’s Independent Review Committee (IRC) for review. The IRC will then take up to 60 calendar days to review the appeal.
An Independent Review Committee (IRC) is an independent body of external experts whose role is to oversee appeals processes for RMI. Each member of the Independent Review Committee (IRC) has a duty to review, deliberate, and decide on conflict of interest matters, grievances, or appeals referred to the IRC by the RMI.